PART 70 OPERATING PERMIT
OFFICE OF AIR MANAGEMENT

Ken-Koat, Inc.
1605 Riverfork Drive East
Huntington, Indiana 46750

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 and 326 IAC 2-1-3.2 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: T069-7676-00018	
Issued by: Janet G. McCabe, Assistant Commissioner Office of Air Management	Issuance Date:

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SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Management (OAM). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

The Permittee owns and operates a stationary metal coating operation.

Responsible Official:	Chris Robertson
Source Address:	1605 Riverfork Drive, Huntington, Indiana 46750
Mailing Address:	PO Box 1027, Huntington, Indiana 46750
SIC Code:	3479
County Location:	Huntington
County Status:	Attainment for all criteria pollutants
Source Status:	Part 70 Permit Program Major Source, under PSD Rules; Major Source, Section 112 of the Clean Air Act

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

This stationary source consists of the following emission units and pollution control devices:

(a) One (1) dip and spin for metal inserts, designated as DS-1, with a maximum adhesive application rate of 5.68 pounds per hour, which exhausts to one (1) stack designated as S-18.

(b) One (1) dip and spin designated as DS-2, with emissions controlled by thermal oxidizer, CE-3, with the following equipment:

(1) One (1) coating tank with a maximum topcoat application rate of 17.97 pounds per hour, which exhausts to one (1) stack designated as C3.

(2) One (1) primer tank with a maximum primer application rate of 4.10 pounds per hour, which exhausts to one (1) stack designated as C3.

(3) One (1) electric heater, which exhausts to one (1) stack designated as C3.

(c) One (1) dip conveyor designated as DC-1, with a maximum application rate of 34.93 pounds per hour, which utilizes one (1) dryer, and is controlled by thermal oxidizer, CE-3, which exhausts to one (1) stack designated as C3

(d) One (1) dip conveyor designated as DC-2, with emissions controlled by thermal oxidizer, CE-3, with the following equipment:

(1) One (1) coating tank with a maximum topcoat application rate of 11.73 pounds per hour, which exhausts to a stack designated as C3.

(2) One (1) primer tank with a maximum primer application rate of 5.32 pounds per hour, which exhausts to one (1) stack designated as C3.

(3) One (1) natural gas drying oven designated as OVEN-1, with a maximum heat input rate of 0.70 million Btu per hour, which exhausts to one (1) stack designated as C3.

(e) One (1) dip conveyor designated as DC-3, with emissions controlled by thermal oxidizer, CE-3, with the following equipment:

(1) One (1) coating tank with a maximum topcoat application rate of 19.06 pounds per hour, which exhausts to one (1) stack designated as C3.

(2) One (1) primer tank with a maximum primer application rate of 4.29 pounds per hour, which exhausts to one (1) stack designated as C3.

(3) One (1) natural gas drying oven designated as OVEN-2, with a maximum heat input rate of 0.70 million Btu per hour, which exhausts to one (1) stack designated as C3.

(f) One (1) dip conveyor designated as DC-4, with emissions controlled by thermal oxidizer, CE-3, with the following equipment:

(1) One (1) coating tank with a maximum topcoat application rate of 17.60 pounds per hour, which exhausts to one (1) stack designated as C3.

(2) One (1) primer tank with a maximum primer application rate of 3.96 pounds per hour, which exhausts to one (1) stack designated as C3.

(3) One (1) natural gas drying oven, designated as OVEN-2, with a maximum heat input rate of 0.70 million Btu per hour, which exhausts to one (1) stack designated as C3.

(g) One (1) ransburg coating process, designated as RCP, controlled by the thermal oxidizer, CE-3, with a maximum metal insert rate of 1000 pounds per hour with the following equipment:

(1) Two (2) electrostatic paint booths, designated as EPB-1 and EPB-2 respectively, each with a maximum application rate of 11.42 pounds per hour, each exhausting to one (1) stack designated as S-15.

(2) One (1) natural gas fired oven, designated as OVEN-3, which exhausts to one (1) stack, designated as C4.

(h) Four (4) HVLP spray booths for painting metal inserts, designated as SB-1, SB-2, SB-3 and SB-4, with a maximum adhesive application rate of 5.94 pounds per hour, 11.91 pounds per hour, 4.92 pounds per hour and 4.38 pounds per hour, respectively. All are equipped with dry filters for particulate matter control. SB-1 exhausts to one (1) stack designated as S-10, SB-2 exhausts to one (1) stack designated as S-11, SB-3 exhausts to one (1) stack designated as S-1, and SB-4 exhausts to one (1) stack designated as S-2.

(i) One (1) open top degreaser, identified as DG, with a maximum trichloroethylene consumption rate of 12 gallons per day which exhausts internally.

(j) Three (3) steel grit blasters, designated as SGB-1, SGB-2, and SGB-3, each with a maximum metal insert throughput of 1200 pounds per hour, controlled by a baghouse designated as CE-1, exhausting to one (1) stack designated as #C1.

(k) One (1) aluminum oxide grit blaster, identified as ALOX-1, with a maximum metal insert throughput of 1200 pounds per hour, controlled by a baghouse designated as CE-2 and exhausting to a stack designated as #C2.

(l) Four (4) HVLP chain on edge machines, designated as COE-1, COE-2, COE-3 and COE-4, with a maximum adhesive application rate of 9.38 pounds per hour, 2.2 pounds per hour, 21.51 pounds per hour and 16.08 pounds per hour, respectively. Each chain on edge machine is equipped with dry filters for particulate matter control. COE-1 exhausts to two (2) stacks designated as S-12 and S-13. COE-2 exhausts to one (1) stack designated as S-6. COE-3 exhausts to three (3) stacks designated as S-3, S-4 and S-5, and COE-4 exhausts to three (3) stacks S-22, S-23 and S-24, each utilizing the thermal oxidizer, CE-3, to control VOC emissions.

(m) One (1) HVLP chain on edge machine, designated as COE-5, with emissions controlled by thermal oxidizer, CE-3, with the following equipment:

(1) Two (2) coating booths with a maximum topcoat application rate of 18.70 pounds per hour, which exhausts to one (1) stack designated as C3.

(2) One (1) primer booth with a maximum primer application rate of 4.27 pounds per hour, which exhausts to one (1) stack designated as C3.

(3) One (1) electric heater which exhausts to one (1) stack designated as C3.

A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

This stationary source also includes the following insignificant activities which are specifically regulated, as defined in 326 IAC 2-7-1(21):

(a) Natural gas-fired combustion sources with heat input equal to or less than ten (10) million Btu per hour:

(1) One (1) natural gas boiler with a maximum heat input capacity of 5.23 million Btu per hour.

(2) One (1) burn-off oven, designated as BURN, maximum heat input capacity of 1 million Btu per hour, ventilated to an afterburner with 90% control efficiency, which exhausts to one (1) stack designated as C4.

(3) One (1) natural gas fired thermal oxidizer designated as CE-3, with a maximum heat input capacity of 6.00 million Btu per hour, with a minimum oxidizing zone temperature of 1400^{o}F.

(b) Infrared cure equipment

(c) Activities associated with the treatment of wastewater streams with an oil and grease content less than or equal to 1% by volume.

(d) Any operation using aqueous solutions containing less than 1% by weight of VOCs excluding HAPs.

(e) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment.

(f) Paved and unpaved roads and parking lots with public access.

(g) Other activities or categories not previously identified:

Insignificant Thresholds:
Lead (Pb) = 0.6 ton/year or 3.29 lbs/day Carbon Monoxide (CO) = 25 lbs/day
Sulfur Dioxides (SO2) = 5 lbs/hour or 25 lbs/day Particulate Matter (PM) = 5 lbs/hour or 25 lbs/day
Nitrogen Oxides (NOX) = 5 lbs/hour or 25 lbs/day Volatile Organic compounds (VOC) = 3 lbs/hour or 15 lbs/day

(1) Two (2) hand painting operations for metal inserts, designated as HPO1 and HPO2, each with a maximum adhesive application rate of 1.04 pounds per hour, coated by either brushes or a small dip pot, which exhausts indoors as fugitive VOC emissions.

(2) Two (2) phosphate cleaning lines, consisting of a series of washes and rinses, which exhausts to one (1) stack designated as S-26.

(3) Two (2) aluminum oxide grit blasters, designated as ALOX-2 and ALOX-3. The maximum metal insert throughput of ALOX-2 and ALOX-3 is 40 pounds per hour each and exhausts indoors as fugitive PM emissions.

A.4 Part 70 Permit Applicability [326 IAC 2-7-2]

This stationary source is required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because:

(a) It is a major source, as defined in 326 IAC 2-7-1(22);

(b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).

SECTION B GENERAL CONDITIONS

B.1 Permit No Defense [IC 13]

(a) Indiana statutes from IC 13 and rules from 326 IAC, quoted in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a Part 70 permit under 326 IAC 2-7.

(b) This prohibition shall not apply to alleged violations of applicable requirements for which the Commissioner has granted a permit shield in accordance with 326 IAC 2-7-15, as set out in this permit in the Section B condition entitled “Permit Shield.”

B.2 Definitions [326 IAC 2-7-1]

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, any applicable definitions found in
IC 13-11, 326 IAC 1-2 and 326 IAC 2-7 shall prevail.

B.3 Permit Term [326 IAC 2-7-5(2)]

This permit is issued for a fixed term of five (5) years from the effective date, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3.

B.4 Enforceability [326 IAC 2-7-7(a)]

(a) All terms and conditions in this permit, including any provisions designed to limit the source's potential to emit, are enforceable by IDEM.

(b) Unless otherwise stated, terms and conditions of this permit, including any provisions to limit the source's potential to emit, are enforceable by the United States Environmental Protection Agency (U.S. EPA) and citizens under the Clean Air Act.

B.5 Termination of Right to Operate [326 IAC 2-7-10] [326 IAC 2-7-4(a)]

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-7-3 and 326 IAC 2-7-4(a).

B.6 Severability [326 IAC 2-7-5(5)]

The provisions of this permit are severable; a determination that any portion of this permit is invalid shall not affect the validity of the remainder of the permit.

B.7 Property Rights or Exclusive Privilege [326 IAC 2-7-5(6)(D)]

This permit does not convey any property rights of any sort, or any exclusive privilege.

B.8 Duty to Supplement and Provide Information [326 IAC 2-7-4(b)] [326 IAC 2-7-5(6)(E)]

(a) The Permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall promptly submit such supplementary facts or corrected information to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

(b) The Permittee shall furnish to IDEM, OAM, within a reasonable time, any information that IDEM, OAM, may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit.

(c) Upon request, the Permittee shall also furnish to IDEM, OAM, copies of records required to be kept by this permit. If the Permittee wishes to assert a claim of confidentiality over any of the furnished records, the Permittee must furnish such records to IDEM, OAM, along with a claim of confidentiality under 326 IAC 17. If requested by IDEM, OAM, or the U.S. EPA, to furnish copies of requested records directly to U. S. EPA, and if the Permittee is making a claim of confidentiality regarding the furnished records, then the Permittee must furnish such confidential records directly to the U.S. EPA along with a claim of confidentiality under 40 CFR 2, Subpart B.

B.9 Compliance with Permit Conditions [326 IAC 2-7-5(6)(A)] [326 IAC 2-7-5(6)(B)]

(a) The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit constitutes a violation of the Clean Air Act and is grounds for:

(1) Enforcement action;

(2) Permit termination, revocation and reissuance, or modification; or

(3) Denial of a permit renewal application.

(b) It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.

B.10 Certification [326 IAC 2-7-4(f)] [326 IAC 2-7-6(1)]

(a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted under this permit shall contain certification by a responsible official of truth, accuracy, and completeness. This certification, and any other certification required under this permit, shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

(b) One (1) certification shall be included, on the attached Certification Form, with each submittal.

(c) A responsible official is defined at 326 IAC 2-7-1(34).

B.11 Annual Compliance Certification [326 IAC 2-7-6(5)]

(a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. The certification shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in letter form no later than July 1 of each year to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Air Enforcement Branch - Indiana (AE-17J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

(b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, on or before the date it is due.

(c) The annual compliance certification report shall include the following:

(1) The identification of each term or condition of this permit that is the basis of the certification;

(2) The compliance status;

(3) Whether compliance was based on continuous or intermittent data;

(4) The methods used for determining compliance of the source, currently and over the reporting period consistent with 326 IAC 2-7-5(3);

(5) Any insignificant activity that has been added without a permit revision; and

(6) Such other facts, as specified in Sections D of this permit, as IDEM, OAM, may require to determine the compliance status of the source.

The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

B.12 Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) and (13)] [326 IAC 2-7-6(1) and (6)] [326 IAC 1-6-3]

(a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMP) within ninety (90) days after issuance of this permit, including the following information on each facility:

(1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;

(2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions;

(3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

If due to circumstances beyond its control, the PMP cannot be prepared and maintained within the above time frame, the Permittee may extend the date an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

(b) The Permittee shall implement the Preventive Maintenance Plans as necessary to ensure that lack of proper maintenance does not cause or contribute to a violation of any limitation on emissions or potential to emit.

(c) PMP's shall be submitted to IDEM, OAM, upon request and shall be subject to review and approval by IDEM, OAM.

B.13 Emergency Provisions [326 IAC 2-7-16]

(a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation, except as provided in 326 IAC 2-7-16.

(b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:

(1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;

(2) The permitted facility was at the time being properly operated;

(3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;

(4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAM, within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone Number: 1-800-451-6027 (ask for Office of Air Management, Compliance Section), or
Telephone Number: 317-233-5674 (ask for Compliance Section)
Facsimile Number: 317-233-5967

(5) For each emergency lasting one (1) hour or more, the Permittee submitted notice, either in writing or facsimile, of the emergency to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

within two (2) working days of the time when emission limitations were exceeded due to the emergency.

The notice fulfills the requirement of 326 IAC 2-7-5(3)(C)(ii) and must contain the following:

(A) A description of the emergency;

(B) Any steps taken to mitigate the emissions; and

(C) Corrective actions taken.

The notification which shall be submitted by the Permittee does not require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

(6) The Permittee immediately took all reasonable steps to correct the emergency.

(c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.

(d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions) for sources subject to this rule after the effective date of this rule. This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.

(e) IDEM, OAM, may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4-(c)(10) be revised in response to an emergency.

(f) Failure to notify IDEM, OAM, by telephone or facsimile of an emergency lasting more than one (1) hour in compliance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-7 and any other applicable rules.

(g) Operations may continue during an emergency only if the following conditions are met:

(1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.

(2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:

(A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and

(B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value.

Any operation shall continue no longer than the minimum time required to prevent the situations identified in (g)(2)(B) of this condition.

B.14 Permit Shield [326 IAC 2-7-15]

(a) This condition provides a permit shield as addressed in 326 IAC 2-7-15.

(b) This permit shall be used as the primary document for determining compliance with applicable requirements established by previously issued permits. Compliance with the conditions of this permit shall be deemed in compliance with any applicable requirements as of the date of permit issuance, provided that:

(1) The applicable requirements are included and specifically identified in this permit; or

(2) The permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable.

(c) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, including any term or condition from a previously issued construction or operation permit, IDEM, OAM, shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.

(d) No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application.

(e) Nothing in 326 IAC 2-7-15 or in this permit shall alter or affect the following:

(1) The provisions of Section 303 of the Clean Air Act (emergency orders), including the authority of the U.S. EPA under Section 303 of the Clean Air Act;

(2) The liability of the Permittee for any violation of applicable requirements prior to or at the time of this permit's issuance;

(3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; and

(4) The ability of U.S. EPA to obtain information from the Permittee under Section 114 of the Clean Air Act.

(f) This permit shield is not applicable to any change made under 326 IAC 2-7-20(b)(2) (Sections 502(b)(10) of the Clean Air Act changes) and 326 IAC 2-7-20(c)(2) (trading based on State Implementation Plan (SIP) provisions).

(g) This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAM, has issued the modifications. [326 IAC 2-7-12(c)(7)]

(h) This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAM, has issued the modification. [326 IAC 2-7-12(b)(7)]

B.15 Multiple Exceedances [326 IAC 2-7-5(1)(E)]

Any exceedance of a permit limitation or condition contained in this permit, which occurs contemporaneously with an exceedance of an associated surrogate or operating parameter established to detect or assure compliance with that limit or condition, both arising out of the same act or occurrence, shall constitute a single potential violation of this permit.

B.16 Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]

(a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provisions), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

within ten (10) calendar days from the date of the discovery of the deviation.

(b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit or a rule. It does not include:

(1) An excursion from compliance monitoring parameters as identified in Section D of this permit unless tied to an applicable rule or limit; or

(2) An emergency as defined in 326 IAC 2-7-1(12); or

(3) Failure to implement elements of the Preventive Maintenance Plan unless lack of maintenance has caused or contributed to a deviation.

(4) Failure to make or record information required by the compliance monitoring provisions of Section D unless such failure exceeds 5% of the required data in any calendar quarter.

A Permittee's failure to take the appropriate response step when an excursion of a compliance monitoring parameter has occurred is a deviation.

(c) Written notification shall be submitted on the attached Emergency/Deviation Occurrence Reporting Form or its substantial equivalent. The notification does not need to be certified by the "responsible official" as defined by 326 IAC 2-7-1(34).

(d) Proper notice submittal under 326 IAC 2-7-16 satisfies the requirement of this subsection.

B.17 Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-7-5(6)(C)] [326 IAC 2-7-8(a)] [326 IAC 2-7-9]

(a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Part 70 permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-7-5(6)(C)]

(b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAM, determines any of the following:

(1) That this permit contains a material mistake.

(2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.

(3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-7-9(a)(3)]

(c) Proceedings by IDEM, OAM, to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-7-9(b)]

(d) The reopening and revision of this permit, under 326 IAC 2-7-9(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAM, at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAM, may provide a shorter time period in the case of an emergency. [326 IAC 2-7-9(c)]

B.18 Permit Renewal [326 IAC 2-7-4]

(a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAM, and shall include the information specified in 326 IAC 2-7-4. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

(b) Timely Submittal of Permit Renewal [326 IAC 2-7-4(a)(1)(D)]

(1) A timely renewal application is one that is:

(A) Submitted at least nine (9) months prior to the date of the expiration of this permit; and

(B) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, on or before the date it is due.

(2) If IDEM, OAM, upon receiving a timely and complete permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, including any permit shield provided in 326 IAC 2-7-15, until the renewal permit has been issued or denied.

(c) Right to Operate After Application for Renewal [326 IAC 2-7-3]
If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-7 until IDEM, OAM, takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAM, any additional information identified as being needed to process the application.

(d) United States Environmental Protection Agency Authority [326 IAC 2-7-8(e)]
If IDEM, OAM, fails to act in a timely way on a Part 70 permit renewal, the U.S. EPA may invoke its authority under Section 505(e) of the Clean Air Act to terminate or revoke and reissue a Part 70 permit.

B.19 Permit Amendment or Modification [326 IAC 2-7-11] [326 IAC 2-7-12]

(a) The Permittee must comply with the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 whenever the Permittee seeks to amend or modify this permit.

(b) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

Any such application should be certified by the "responsible official" as defined by 326 IAC 2-7-1(34) only if a certification is required by the terms of the applicable rule

(c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

B.20 Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-7-5(8)] [326 IAC 2-7-12 (b)(2)]

(a) No Part 70 permit revision shall be required under any approved economic incentives, marketable Part 70 permits, emissions trading, and other similar programs or processes for changes that are provided for in a Part 70 permit.

(b) Notwithstanding 326 IAC 2-7-12(b)(1)(D)(i) and 326 IAC 2-7-12(c)(1), minor Part 70 permit modification procedures may be used for Part 70 modifications involving the use of economic incentives, marketable Part 70 permits, emissions trading, and other similar approaches to the extent that such minor Part 70 permit modification procedures are explicitly provided for in the applicable State Implementation Plan (SIP) or in applicable requirements promulgated or approved by the U.S. EPA.

B.21 Changes Under Section 502(b)(10) of the Clean Air Act [326 IAC 2-7-20(b)]

The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-7-20(a) and the following additional conditions:

(a) For each such change, the required written notification shall include a brief description of the change within the source, the date on which the change will occur, any change in emissions, and any permit term or condition that is no longer applicable as a result of the change.

(b) The permit shield, described in 326 IAC 2-7-15, shall not apply to any change made under 326 IAC 2-7-20(b).

B.22 Operational Flexibility [326 IAC 2-7-20]

(a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-7-20(b), (c), or (e), without a prior permit revision, if each of the following conditions is met:

(1) The changes are not modifications under any provision of Title I of the Clean Air Act;

(2) Any approval required by 326 IAC 2-1 has been obtained;

(3) The changes do not result in emissions which exceed the emissions allowable under this permit (whether expressed herein as a rate of emissions or in terms of total emissions);

(4) The Permittee notifies the:

Indiana Department of Environmental Management
Permits Branch, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

in advance of the change by written notification at least ten (10) days in advance of the proposed change. The Permittee shall attach every such notice to the Permittee's copy of this permit; and

(5) The Permittee maintains records on-site which document, on a rolling five (5) year basis, all such changes and emissions trading that are subject to 326 IAC 2-7-20(b), (c), or (e) and makes such records available, upon reasonable request, for public review.

Such records shall consist of all information required to be submitted to IDEM, OAM, in the notices specified in 326 IAC 2-7-20(b), (c)(1), and (e)(2).

(b) For each such Section 502(b)(10) of the Clean Air Act change, the required written notification shall include the following:

(1) A brief description of the change within the source;

(2) The date on which the change will occur;

(3) Any change in emissions; and

(4) Any permit term or condition that is no longer applicable as a result of the change.

The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(c) Emission Trades [326 IAC 2-7-20(c)]
The Permittee may trade increases and decreases in emissions in the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-7-20(c).

(d) Alternative Operating Scenarios [326 IAC 2-7-20(d)]
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-7-5(9). No prior notification of IDEM, OAM, or U.S. EPA is required.

(e) Backup fuel switches specifically addressed in, and limited under, Section D of this permit shall not be considered alternative operating scenarios. Therefore, the notification requirements of part (a) of this condition do not apply.

B.23 Construction Permit Requirement [326 IAC 2]

Except as allowed by Indiana P.L. 130-1996 Section 12, as amended by P.L. 244-1997, modification, construction, or reconstruction shall be approved as required by and in accordance with 326 IAC 2.

B.24 Inspection and Entry [326 IAC 2-7-6(2)]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, the Permittee shall allow IDEM, OAM, U.S. EPA, or an authorized representative to perform the following:

(a) Enter upon the Permittee's premises where a Part 70 source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;

(b) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;

(c) Inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;

(d) Sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and

(e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements. [326 IAC 2-7-6(6)]

(1) The Permittee may assert a claim that, in the opinion of the Permittee, information removed or about to be removed from the source by IDEM, OAM, or an authorized representative, contains information that is confidential under IC 5-14-3-4(a). The claim shall be made in writing before or at the time the information is removed from the source. In the event that a claim of confidentiality is so asserted, neither IDEM, OAM, nor an authorized representative, may disclose the information unless and until IDEM, OAM, makes a determination under 326 IAC 17-1-7 through 326 IAC 17-1-9 that the information is not entitled to confidential treatment and that determination becomes final. [IC 5-14-3-4; IC 13-14-11-3; 326 IAC 17-1-7 through 326 IAC 17-1-9]

(2) The Permittee, and IDEM, OAM, acknowledge that the federal law applies to claims of confidentiality made by the Permittee with regard to information removed or about to be removed from the source by U.S. EPA. [40 CFR Part 2, Subpart B]

B.25 Transfer of Ownership or Operational Control [326 IAC 2-7-11]

(a) The Permittee must comply with the requirements of 326 IAC 2-7-11 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.

(b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

The application which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

B.26 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)]

(a) The Permittee shall pay annual fees to IDEM, OAM, within thirty (30) calendar days of receipt of a billing. If the Permittee does not receive a bill from IDEM, OAM, the applicable fee is due April 1 of each year.

(b) Failure to pay may result in administrative enforcement action or revocation of this permit.

(c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-0425 (ask for OAM, Technical Support and Modeling Section), to determine the appropriate permit fee.

B.27 Advanced Source Modification Approval [326 IAC 2-7-5(16)]

The requirements to obtain a source modification approval under 326 IAC 2-7-10.5 or a permit modification under 326 IAC 2-7-12 are satisfied by this permit for the proposed emission units, control equipment or insignificant activities in Sections A.2 and A.3 and such modifications occur only during the term of this permit.

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

Emission Limitations and Standards [326 IAC 2-7-5(1)]

C.1 Particulate Matter Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) pounds per hour [326 IAC 6-3-2(c)]

Pursuant to 326 IAC 6-3-2(c), the allowable particulate matter emissions rate from any process not already regulated by 326 IAC 6-1 or any New Source Performance Standard, and which has a maximum process weight rate less than 100 pounds per hour shall not exceed 0.551 pounds per hour.

C.2 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Exemptions), opacity shall meet the following, unless otherwise stated in this permit:

(a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

(b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings) as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

C.3 Open Burning [326 IAC 4-1] [IC 13-17-9]

The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1. 326 IAC 4-1-3 (a)(2)(A) and (B) are not federally enforceable.

C.4 Incineration [326 IAC 4-2][326 IAC 9-1-2]

The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and 326 IAC 9-1-2.

C.5 Fugitive Dust Emissions [326 IAC 6-4]

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions). 326 IAC 6-4-2(4) is not federally enforceable.

C.6 Operation of Equipment [326 IAC 2-7-6(6)]

All air pollution control equipment listed in this permit and used to comply with an applicable requirement shall be operated at all times that the emission units vented to the control equipment are in operation.

C.7 Stack Height [326 IAC 1-7]

The Permittee shall comply with the applicable provisions of 326 IAC 1-7 (Stack Height Provisions), for all exhaust stacks through which a potential (before controls) of twenty-five (25) tons per year or more of particulate matter or sulfur dioxide is emitted.

C.8 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61.140]

(a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.

(b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:

(1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or

(2) If there is a change in the following:

(A) Asbestos removal or demolition start date;

(B) Removal or demolition contractor; or

(C) Waste disposal site.

(c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).

(d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management
Asbestos Section, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

The notifications do not require a certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(e) Procedures for Asbestos Emission Control
The Permittee shall comply with the emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-4 emission control requirements are mandatory for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.

(f) Indiana Accredited Asbestos Inspector
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement that the inspector be accredited is federally enforceable.

Testing Requirements [326 IAC 2-7-6(1)]

C.9 Performance Testing [326 IAC 3-6]

(a) All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing methods approved by IDEM, OAM.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

no later than thirty-five (35) days prior to the intended test date. The Permittee shall submit a notice of the actual test date to the above address so that it is received at least two weeks prior to the test date.

(b) All test reports must be received by IDEM, OAM within forty-five (45) days after the completion of the testing. An extension may be granted by the Commissioner, if the source submits to IDEM, OAM, a reasonable written explanation within five (5) days prior to the end of the initial forty-five (45) day period.

The documentation submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Compliance Monitoring Requirements [326 IAC 2-7-5(1)] [326 IAC 2-7-6(1)]

C.10 Compliance Schedule [326 IAC 2-7-6(3)]

The Permittee:

(a) Has certified that all facilities at this source are in compliance with all applicable requirements; and

(b) Has submitted a statement that the Permittee will continue to comply with such requirements; and

(c) Will comply with such applicable requirements that become effective during the term of this permit.

C.11 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

Compliance with applicable requirements shall be documented as required by this permit. The Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment, no more than ninety (90) days after receipt of this permit. If due to circumstances beyond its control, this schedule cannot be met, the Permittee may extend the compliance schedule an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

in writing, prior to the end of the initial ninety (90) day compliance schedule, with full justification of the reasons for the inability to meet this date.

The notification which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

C.12 Maintenance of Monitoring Equipment [326 IAC 2-7-5(3)(A)(iii)]

(a) In the event that a breakdown of the monitoring equipment occurs, a record shall be made of the times and reasons of the breakdown and efforts made to correct the problem. To the extent practicable, supplemental or intermittent monitoring of the parameter should be implemented at intervals no less frequent than required in Section D of this permit until such time as the monitoring equipment is back in operation. In the case of continuous monitoring, supplemental or intermittent monitoring of the parameter should be implemented at intervals no less than one (1) hour until such time as the continuous monitor is back in operation.

(b) The Permittee shall install, calibrate, quality assure, maintain, and operate all necessary monitors and related equipment. In addition, prompt corrective action shall be initiated whenever indicated.

C.13 Monitoring Methods [326 IAC 3]

Any monitoring or testing performed to meet the applicable requirements of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, or other approved methods as specified in this permit.

Corrective Actions and Response Steps [326 IAC 2-7-5] [326 IAC 2-7-6]

C.14 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]

Pursuant to 326 IAC 1-5-2 (Emergency Reduction Plans; Submission):

(a) The Permittee shall prepare written emergency reduction plans (ERPs) consistent with safe operating procedures.

(b) These ERPs shall be submitted for approval to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

within ninety (90) days after the date of issuance of this permit; and

within one hundred eighty (180) days from the date on which chain on edge machine (COE-5) commences operation.

The ERP does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(c) If the ERP is disapproved by IDEM, OAM, the Permittee shall have an additional thirty (30) days to resolve the differences and submit an approvable ERP.

(d) These ERPs shall state those actions that will be taken, when each episode level is declared, to reduce or eliminate emissions of the appropriate air pollutants.

(e) Said ERPs shall also identify the sources of air pollutants, the approximate amount of reduction of the pollutants, and a brief description of the manner in which the reduction will be achieved.

(f) Upon direct notification by IDEM, OAM, that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level. [326 IAC 1-5-3]

C.15 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68.215]

If a regulated substance, subject to 40 CFR 68, is present at a source in more than a threshold quantity, 40 CFR 68 is an applicable requirement and the Permittee shall:

(a) Submit:

(1) A compliance schedule for meeting the requirements of 40 CFR 68 by the date provided in 40 CFR 68.10(a); or

(2) As a part of the compliance certification submitted under 326 IAC 2-7-6(5), a certification statement that the source is in compliance with all the requirements of 40 CFR 68, including the registration and submission of a Risk Management Plan (RMP); and

(3) A verification to IDEM, OAM, that a RMP or a revised plan was prepared and submitted as required by 40 CFR 68.

(b) Provide annual certification to IDEM, OAM, that the Risk Management Plan is being properly implemented.

All documents submitted pursuant to this condition shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

C.16 Compliance Monitoring Plan - Failure to Take Response Steps [326 IAC 2-7-5][326 IAC 2-7-6] [326 IAC 1-6]

(a) The Permittee is required to implement a compliance monitoring plan to ensure that reasonable information is available to evaluate its continuous compliance with applicable requirements. This compliance monitoring plan is comprised of:

(1) This condition;

(2) The Compliance Determination Requirements in Section D of this permit;

(3) The Compliance Monitoring Requirements in Section D of this permit;

(4) The Record Keeping and Reporting Requirements in Section C (Monitoring Data Availability, General Record Keeping Requirements, and General Reporting Requirements) and in Section D of this permit; and

(5) A Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. CRP's shall be submitted to IDEM, OAM upon request and shall be subject to review and approval by IDEM, OAM. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee and maintained on site, and is comprised of :

(A) Response steps that will be implemented in the event that compliance related information indicates that a response step is needed pursuant to the requirements of Section D of this permit; and

(B) A time schedule for taking such response steps including a schedule for devising additional response steps for situations that may not have been predicted.

(b) For each compliance monitoring condition of this permit, appropriate response steps shall be taken when indicated by the provisions of that compliance monitoring condition. Failure to perform the actions detailed in the compliance monitoring conditions or failure to take the response steps within the time prescribed in the Compliance Response Plan, shall constitute a violation of the permit unless taking the response steps set forth in the Compliance Response Plan would be unreasonable.

(c) After investigating the reason for the excursion, the Permittee is excused from taking further response steps for any of the following reasons:

(1) The monitoring equipment malfunctioned, giving a false reading. This shall be an excuse from taking further response steps providing that prompt action was taken to correct the monitoring equipment.

(2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for an administrative amendment to the permit, and such request has not been denied or;

(3) An automatic measurement was taken when the process was not operating; or

(4) The process has already returned to operating within "normal" parameters and no response steps are required.

(d) Records shall be kept of all instances in which the compliance related information was not met and of all response steps taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.

C.17 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5] [326 IAC 2-7-6]

(a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate corrective actions. The Permittee shall submit a description of these corrective actions to IDEM, OAM, within thirty (30) days of receipt of the test results.

The Permittee shall take appropriate action to minimize emissions from the affected facility while the corrective actions are being implemented. IDEM, OAM shall notify the Permittee within thirty (30) days, if the corrective actions taken are deficient. The Permittee shall submit a description of additional corrective actions taken to IDEM, OAM within thirty (30) days of receipt of the notice of deficiency. IDEM, OAM reserves the authority to use enforcement activities to resolve noncompliant stack tests.

(b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAM that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAM may extend the retesting deadline. Failure of the second test to demonstrate compliance with the appropriate permit conditions may be grounds for immediate revocation of the permit to operate the affected facility.

The documents submitted pursuant to this condition do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

C.18 Emission Statement [326 IAC 2-7-5(3)(C)(iii)][326 IAC 2-7-5(7)][326 IAC 2-7-19(c)][326 IAC 2-6]

(a) The Permittee shall submit an annual emission statement certified pursuant to the requirements of 326 IAC 2-6, that must be received by July 1 of each year and must comply with the minimum requirements specified in 326 IAC 2-6-4. The annual emission statement shall meet the following requirements:

(1) Indicate actual emissions of criteria pollutants from the source, in compliance with 326 IAC 2-6 (Emission Reporting);

(2) Indicate actual emissions of other regulated pollutants from the source, for purposes of Part 70 fee assessment.

(b) The annual emission statement covers the twelve (12) consecutive month time period starting January 1 and ending December 31. The annual emission statement must be submitted to:

Indiana Department of Environmental Management
Technical Support and Modeling Section, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

(c) The annual emission statement required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM on or before the date it is due.

C.19 Monitoring Data Availability [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)]

(a) With the exception of performance tests conducted in accordance with Section C-Performance Testing, all observations, sampling, maintenance procedures, and record keeping, required as a condition of this permit shall be performed at all times the equipment is operating at normal representative conditions.

(b) As an alternative to the observations, sampling, maintenance procedures, and record keeping of subsection (a) above, when the equipment listed in Section D of this permit is not operating, the Permittee shall either record the fact that the equipment is shut down or perform the observations, sampling, maintenance procedures, and record keeping that would otherwise be required by this permit.

(c) If the equipment is operating but abnormal conditions prevail, additional observations and sampling should be taken with a record made of the nature of the abnormality.

(d) If for reasons beyond its control, the operator fails to make required observations, sampling, maintenance procedures, or record keeping, reasons for this must be recorded.

(e) At its discretion, IDEM may excuse such failure providing adequate justification is documented and such failures do not exceed five percent (5%) of the operating time in any quarter.

(f) Temporary, unscheduled unavailability of staff qualified to perform the required observations, sampling, maintenance procedures, or record keeping shall be considered a valid reason for failure to perform the requirements stated in (a) above.

C.20 General Record Keeping Requirements [326 IAC 2-7-5(3)][326 IAC 2-7-6]

(a) Records of all required monitoring data and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location for a minimum of three (3) years and available upon the request of an IDEM, OAM, representative. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a written request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

(b) Records of required monitoring information shall include, where applicable:

(1) The date, place, and time of sampling or measurements;

(2) The dates analyses were performed;

(3) The company or entity performing the analyses;

(4) The analytic techniques or methods used;

(5) The results of such analyses; and

(6) The operating conditions existing at the time of sampling or measurement.

(c) Support information shall include, where applicable:

(1) Copies of all reports required by this permit;

(2) All original strip chart recordings for continuous monitoring instrumentation;

(3) All calibration and maintenance records;

(4) Records of preventive maintenance shall be sufficient to demonstrate that improper maintenance did not cause or contribute to a violation of any limitation on emissions or potential to emit. To be relied upon subsequent to any such violation, these records may include, but are not limited to: work orders, parts inventories, and operator's standard operating procedures. Records of response steps taken shall indicate whether the response steps were performed in accordance with the Compliance Response Plan required by Section C - Compliance Monitoring Plan - Failure to take Response Steps, of this permit, and whether a deviation from a permit condition was reported. All records shall briefly describe what maintenance and response steps were taken and indicate who performed the tasks.

(d) All record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

C.21 General Reporting Requirements [326 IAC 2-7-5(3)(C)]

(a) To affirm that the source has met all the compliance monitoring requirements stated in this permit the source shall submit a Quarterly Compliance Monitoring Report. Any deviation from the requirements and the date(s) of each deviation must be reported. The Compliance Monitoring Report shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

(c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, on or before the date it is due.

(d) Unless otherwise specified in this permit, any quarterly report shall be submitted within thirty (30) days of the end of the reporting period. The reports do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(e) All instances of deviations as described in Section B- Deviations from Permit Requirements Conditions must be clearly identified in such reports. The Emergency/Deviation Occurrence Report does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(f) Any corrective actions or response steps taken as a result of each deviation must be clearly identified in such reports.

(g) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period.

Stratospheric Ozone Protection

C.22 Compliance with 40 CFR 82 and 326 IAC 22-1

Pursuant to 40 CFR 82 (Protection of Stratospheric Ozone), Subpart F, except as provided for motor vehicle air conditioners in Subpart B, the Permittee shall comply with the standards for recycling and emissions reduction:

(a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to 40 CFR 82.156.

(b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.

(c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

SECTION D.1 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]

(a) One (1) dip and spin designated as DS-2, with emissions controlled by thermal oxidizer, CE-3, with the following equipment:

(1) One (1) coating tank with a maximum topcoat application rate of 17.97 pounds per hour, which exhausts to one (1) stack designated as C3.
(2) One (1) primer tank with a maximum primer application rate of 4.10 pounds per hour, which exhausts to one (1) stack designated as C3.
(3) One (1) electric heater, which exhausts to one (1) stack designated as C3.

(b) One (1) dip conveyor designated as DC-2, with emissions controlled by thermal oxidizer, CE-3, with the following equipment:

(1) One (1) coating tank with a maximum topcoat application rate of 11.73 pounds per hour, which exhausts to a stack designated as C3.
(2) One (1) primer tank with a maximum primer application rate of 5.32 pounds per hour, which exhausts to one (1) stack designated as C3.
(3) One (1) natural gas drying oven designated as OVEN-1, with a maximum heat input rate of 0.70 million Btu per hour, which exhausts to one (1) stack designated as C3.

(c) One (1) dip conveyor designated as DC-3, with emissions controlled by thermal oxidizer, CE-3, with the following equipment:

(1) One (1) coating tank with a maximum topcoat application rate of 19.06 pounds per hour, which exhausts to one (1) stack designated as C3.
(2) One (1) primer tank with a maximum primer application rate of 4.29 pounds per hour, which exhausts to one (1) stack designated as C3.
(3) One (1) natural gas drying oven designated as OVEN-2, with a maximum heat input rate of 0.70 million Btu per hour, which exhausts to one (1) stack designated as C3.

(d) One (1) dip conveyor designated as DC-4, with emissions controlled by thermal oxidizer, CE-3, with the following equipment:

(1) One (1) coating tank with a maximum topcoat application rate of 17.60 pounds per hour, which exhausts to one (1) stack designated as C3.
(2) One (1) primer tank with a maximum primer application rate of 3.96 pounds per hour, which exhausts to one (1) stack designated as C3.
(3) One (1) natural gas drying oven, designated as OVEN-2, with a maximum heat input rate of 0.70 million Btu per hour, which exhausts to one (1) stack designated as C3.

(e) One (1) natural gas fired thermal oxidizer designated as CE-3, with a maximum heat input capacity of 6.00 million Btu per hour, with a minimum oxidizing zone temperature of 1400°F.

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.1.1 Volatile Organic Compounds (VOC) [326 IAC 8-2-9]

(a) Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), no owner or operator of a facility engaged in the surface coating of miscellaneous metal parts or products may cause, allow, or permit the discharge into the atmosphere of any volatile organic compounds in excess of 3.5 pounds of VOC per gallon of coating less water.

(b) When operating the thermal oxidizer, CE-3, to achieve the limit established under 326 IAC 8-2-9 (3.5 pounds of VOC emitted to the atmosphere per gallon of coating less water) the thermal oxidizer shall maintain a minimum 94.1% capture efficiency and a minimum 98% destruction efficiency of the VOC captured. These efficiencies and the use of the thermal oxidizer are required by 326 IAC 8-1-2 (a)(2). Based upon 326 IAC 8-1-2(c) and the overall control efficiency of 92.2%, the VOC content of the coating per gallon of solids delivered to any of the facilities listed above in Section D.1 (DC-2, DC-3, DC-4, and DS-2), the following facilities listed in Section D.2 (RCP, COE-3 and COE-4) and COE-5 listed in Section D.5 shall be limited to 67.8. This overall efficiency of 92.2% shall be maintained in order to demonstrate compliance with 326 IAC 8-2-9 and 326 IAC 8-1-2(a)(2).

D.1.2 New Source Toxics Control [326 IAC 2-1-3.4]

The allowable HAP emissions shall be based on the Maximum Achievable Control Technology (MACT) analysis determined by the Office of Air Management. The MACT for the facilities listed above in section D.1 (DC-2, DC-3, DC-4, and DS-2), shall be the use of the thermal oxidizer, CE-3, as described in Condition D.1.1(b), in combination with the application method of dip coating. The overall efficiency of this control device shall be 92.2%.

D.1.3 PSD Modification [326 IAC 2-2] [40 CFR 52.21]

Any change or modification which may increase the VOC PTE of DC-2, DC-3, DC-4, DS-2, CE-3 and COE-5 (listed in Section D.5) to greater than 249 tons per year, shall require prior approval from the Office of Air Management before such change may occur.

D.1.4 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for DC-2, DC-3, DC-4, and DS-2 and any control devices (CE-3).

Compliance Determination Requirements

D.1.5 Testing Requirements [326 IAC 2-7-6(1),(6)]

(a) Testing of this facility is specifically required by this permit and pursuant to CP No. 069-9246-00018, issued on September 25, 1998. Compliance with the control efficiency and minimum operating temperature specified in Condition D.1.1(b) shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

(b) Pursuant to CP No. 069-9246-00018, issued on September 25, 1998, during the period within 60 days after achieving maximum production rate, but no later than 180 days after initial start-up, a performance test shall be required to demonstrate that the source is complying with 326 IAC 8-2-9.

(1) If the oxidizer is determined to demonstrate compliance, the required temperature and control efficiency shall be specified.

(2) If the oxidizer is determined to not demonstrate compliance, the efficiency needed to comply with 326 IAC 8-2-9 shall be determined by the performance test.

(3) The source shall be required to comply with the required control efficiency as determined by the performance test.

(c) This test shall be repeated at least once every two and one-half (2.5) years from the date of this valid compliance demonstration. In addition to these requirements, IDEM may require compliance testing when necessary to determine if the facility is in compliance.

D.1.6 Volatile Organic Compounds (VOC)

Compliance with the VOC content and usage limitations contained in Condition D.1.1 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer. IDEM, OAM, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.1.7 Recuperative Thermal Oxidizer Operations

(a) When operating the thermal oxidizer to achieve the limit established under 326 IAC 8-2-9, 3.5 pounds of VOC per gallon of coating less water, the thermal oxidizer shall maintain a minimum operating temperature of 1400° F, or a minimum operating temperature as determined by the most recent compliance test, to maintain a minimum 94.1% capture efficiency and a 98% destruction efficiency of the volatile organic compounds captured. The recuperative thermal oxidizer shall operate at all times, to demonstrate compliance with Conditions D.1.1 and D.1.2, when DC-2, DC-3, DC-4, and DS-2 are in operation.

(b) The owner or operator shall install, calibrate, operate and maintain a device that continuously records the combustion temperature of any effluent gases incinerated to achieve compliance with the limit in Condition D.1.2.

(1) This device shall have an accuracy of ± 2.5EC or ± 0.75 percent of the temperature range measured in degrees Celsius, whichever is greater.

(c) Any change or modification which may increase the VOC actual emissions to 250 tons per year or more shall require prior approval from OAM before such change may occur.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.1.8 Record Keeping Requirements

(a) To document compliance with Conditions D.1.1 and D.1.2, the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC and HAPs usage limits and the VOC and HAPs emission limits established in Conditions D.1.1 and D.1.2.

(1) The amount of VOC and HAP content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;

(2) A log of the dates of use;

(3) The cleanup solvent usage for each month;

(4) The total VOC usage for each month;

(5) The total HAPs usage for each month; and

(6) Monthly emissions in pounds of VOC and HAPs.

(b) Continuous or intermittent readings of the minimum operating temperature shall be maintained to document compliance with Condition D.1.9.

(c) Record of all malfunctions (any sudden unavoidable failure of the thermal oxidizers, CE01, CE02, and CE03) which result in violations of the Office of Air Management rules shall be kept for a period of three (3) years and made available to OAM upon request. When a malfunction resulting in a limit or parameter deviation occurs that lasts in excess of one (1) hour, notification of the condition shall be made to OAM no later than four (4) daytime business hours after the occurrence.

(d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.9 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.1.1 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported.

SECTION D.2 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]

(a) One (1) dip conveyor designated as DC-1, with a maximum application rate of 34.93 pounds per hour, which utilizes one (1) dryer, and is controlled by thermal oxidizer, CE-3, which exhausts to one (1) stack designated as C3.

(b) One (1) dip and spin for metal inserts, designated as DS-1, with a maximum adhesive application rate of 5.68 pounds per hour, which exhausts to one (1) stack designated as S-18.

(c) One (1) ransburg coating process, designated as RCP, controlled by the thermal oxidizer, CE-3, with a maximum metal insert rate of 1000 pounds per hour with the following equipment:

(1) Two (2) electrostatic paint booths, designated as EPB-1 and EPB-2 respectively, each with a maximum application rate of 11.42 pounds per hour, each equipped with dry filters for particulate matter control, and each exhausting to one (1) stack designated as S-14 and S-15 respectively.

(2) One (1) natural gas fired oven, designated as OVEN-3, which exhausts to one (1) stack, designated as C4.

(d) Four (4) HVLP spray booths for painting metal inserts, designated as SB-1, SB-2, SB-3 and SB-4, with a maximum adhesive application rate of 5.94 pounds per hour, 11.91 pounds per hour, 4.92 pounds per hour and 4.38 pounds per hour, respectively. All are equipped with dry filters for particulate matter control. SB-1 exhausts to one (1) stack designated as S-10, SB-2 exhausts to one (1) stack designated as S-11, SB-3 exhausts to one (1) stack designated as S-1, and SB-4 exhausts to one (1) stack designated as S-2.

(e) Four (4) HVLP chain on edge machines, designated as COE-1, COE-2, COE-3 and COE-4, with a maximum adhesive application rate of 9.38 pounds per hour, 2.2 pounds per hour, 21.51 pounds per hour and 16.08 pounds per hour, respectively. Each chain on edge machine is equipped with dry filters for particulate matter control. COE-1 exhausts to two (2) stacks designated as S-12 and S-13. COE-2 exhausts to one (1) stack designated as S-6. COE-3 exhausts to three (3) stacks designated as S-3, S-4 and S-5, and COE-4 exhausts to three (3) stacks S-22, S-23 and S-24, each utilizing the thermal oxidizer, CE-3, to control VOC emissions.

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.2.1 Volatile Organic Compounds (VOC) [326 IAC 8-2-9]

(a) Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), no owner or operator of a facility engaged in the surface coating of miscellaneous metal parts or products may cause, allow, or permit the discharge into the atmosphere of any volatile organic compounds in excess of 3.5 pounds of VOC per gallon of coating less water.

(b) When operating the thermal oxidizer, CE-3, to achieve the limit established under 326 IAC 8-2-9 (3.5 pounds of VOC emitted to the atmosphere per gallon of coating less water) the thermal oxidizer shall maintain a minimum 94.1% capture efficiency and a minimum 98% destruction efficiency of the VOC captured. These efficiencies and the use of the thermal oxidizer are required by 326 IAC 8-1-2 (a)(2).

Based upon 326 IAC 8-1-2(c) and the overall control efficiency of 92.2%, the VOC content of the coating per gallon of solids delivered to any of the facilities listed above in Section D.2 (DC-1, RCP, COE-3 and COE-4) and the facilities listed in Section D.1 (DC-2, DC-3, DC-4, and DS-2) and COE-5 listed in Section D.5 shall be limited to 67.8. This overall efficiency of 92.2% shall be maintained in order to demonstrate compliance with 326 IAC 8-2-9 and 326 IAC 8-1-2(a)(2).

(c) Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), solvent sprayed from the application equipment during cleanup or color changes shall be directed into containers. Such containers shall be closed as soon as such solvent spraying is complete, and the waste solvent shall be disposed of in such a manner that evaporation is minimized.

(d) The input of VOC to DC-1, RCP, COE-3, and COE-4 and the usage of cleanup solvent for DC-1, RCP, COE-3, and COE-4 (the usage of cleanup solvent may need to take into account any recycling of cleanup rags or reused solvent) shall be limited to 2564 tons used per twelve (12) consecutive months period. This limitation will prevent the VOC emissions from DC-1, RCP, COE-3, and COE-4 from being greater than 200 tons per twelve (12) consecutive month period. This limitation is based upon the use of a control device with an overall control efficiency of 92.2%.

(e) The input of VOC including cleanup solvent, minus the VOC solvent shipped out, delivered to the applicators of SB-1, SB-2, SB-3 and SB-4 shall each be limited to less than 25 tons per twelve (12) consecutive month period. Therefore, the requirements of 326 IAC 8-2-9 will not apply.

(f) The input VOC of COE-1, COE-2 and DS-1 shall each be limited to less than 25 tons per twelve (12) consecutive month period. Therefore, the requirements of 326 IAC 8-2-9 will not apply.

D.2.2 PSD Minor Limit [326 IAC 2-2] [40 CFR 52.21]

The VOC input of the above listed facilities in Section D.2 (DC-1, DS-1, RCP, SB-1-SB-4 and COE-1-COE-4), and Section D.4 (DG) shall be limited to less than 250 tons per twelve (12) consecutive month period. This production limitation is equivalent to a VOC potential to emit of less than 250 tons per twelve (12) consecutive month period, therefore, the Prevention of Significant Deterioration (PSD) rules, 326 IAC 2-2 and 40 CFR 52.21, will not apply.

D.2.3 Particulate Matter (PM) [326 IAC 6-3]

Pursuant to 326 IAC 6-3 (Process Operations), the allowable PM emission rate from the four (4) HVLP spray booths, the four (4) chain on edge machines and the ransburg coating process shall not exceed allowable PM emission rate based on the following equation:

Interpolation and extrapolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

$E = 4.10\ P^{0.67}$ where E = rate of emission in pounds per hour; and
P = process weight rate in tons per hour

D.2.4 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for DC-1, SB-1-SB-4, RCP, COE-3 and COE-4 and any control devices.

Compliance Determination Requirements

D.2.5 Testing Requirements [326 IAC 2-7-6(1),(6)]

During the period within 60 days after achieving maximum production rate, but no later than 180 days after initial start-up, a performance test shall be required to demonstrate that the source is complying with 326 IAC 8-2-9. This test shall be repeated at least once every two and one-half (2.5) years from the date of this valid compliance demonstration. In addition to these requirements, IDEM may require compliance testing when necessary to determine if the facility is in compliance.

D.2.6 Volatile Organic Compounds (VOC)

Compliance with the VOC content and usage limitations contained in Condition D.2.1 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer. IDEM, OAM, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

D.2.7 VOC Emissions

Compliance with Conditions D.2.1 and D.2.2 shall be demonstrated at the end of each month based on the total volatile organic compound usage for the most recent twelve (12) month period.

D.2.8 Particulate Matter (PM)

The dry filters for PM control shall be in operation at all times when the four (4) HVLP spray booths (SB-1-SB-4), the four (4) chain on edge machines (COE-1-COE-4) and the ransburg coating process (RCP) are in operation.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.2.9 Recuperative Thermal Oxidizer Operations

(a) When operating the thermal oxidizer to achieve the limit established under 326 IAC 8-2-9, 3.5 pounds of VOC per gallon of coating less water, the thermal oxidizer shall maintain a minimum operating temperature of 1400° F, or a minimum operating temperature as determined by the most recent compliance test, to maintain a minimum 94.1% capture efficiency and a 98% destruction efficiency of the volatile organic compounds captured. The recuperative thermal oxidizer shall operate at all times, to demonstrate compliance with Condition D.2.1, when DC-1, RCP, COE-3 and COE-4 are in operation.

(b) The owner or operator shall install, calibrate, operate and maintain a device that continuously records the combustion temperature of any effluent gases incinerated to achieve compliance with the limit in Condition D.1.2.

(1) This device shall have an accuracy of ± 2.5EC or ± 0.75 percent of the temperature range measured in degrees Celsius, whichever is greater.

(c) Any change or modification which may increase the VOC actual emissions to 250 tons per year or more shall require prior approval from OAM before such change may occur.

D.2.10 Monitoring

(a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth stacks (S-1, S-2, S-3, S-4, S-5, S-6, S-10, S-11, S-12, S-13, S-14, S-22, S-23, and S-24) while one or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

(b) Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground.
The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

(c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.2.11 Record Keeping Requirements

(a) To document compliance with Condition D.2.1, the Permittee shall maintain records in accordance with (1) through (7) below. Records maintained for (1) through (7) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC and HAPs usage limits and the VOC and HAPs emission limits established in Conditions D.2.1.

(1) The amount of VOC and HAP content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;

(2) A log of the dates of use;

(3) The daily volume weighted VOC content of the coatings as applied;

(4) The cleanup solvent usage for each month;

(5) The total VOC usage for each month;

(6) The total HAPs usage for each month; and

(7) Monthly emissions in pounds of VOC and HAPs.

(b) Continuous or intermittent readings of the minimum operating temperature shall be maintained to document compliance with Condition D.1.9.

(c) Record of all malfunctions (any sudden unavoidable failure of the thermal oxidizers, CE01, CE02, and CE03) which result in violations of the Office of Air Management rules shall be kept for a period of three (3) years and made available to OAM upon request. When a malfunction resulting in a limit or parameter deviation occurs that lasts in excess of one (1) hour, notification of the condition shall be made to OAM no later than four (4) daytime business hours after the occurrence.

(d) To document compliance with Conditions D.2.8 and D.2.10, the Permittee shall maintain a log of weekly overspray observations, daily and monthly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.

(e) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.2.12 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.2.1 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported.

SECTION D.3 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]

(a) Three (3) steel grit blasters, designated as SGB-1, SGB-2, and SGB-3, each with a maximum metal insert throughput of 1200 pounds per hour, controlled by a baghouse designated as CE-1, exhausting to one (1) stack designated as #C1.

(b) One (1) aluminum oxide grit blaster, identified as ALOX-1, with a maximum metal insert throughput of 1200 pounds per hour, controlled by a baghouse designated as CE-2 and exhausting to a stack designated as C2.

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.3.1 Particulate Matter (PM) [326 IAC 6-3]

Pursuant to 326 IAC 6-3 (Process Operations), the allowable PM emission rate from the three (3) steel grit blasters and the aluminum oxide grit blaster shall not exceed allowable PM emission rate based on the following equation:

Interpolation and extrapolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

$E = 4.10\ P^{0.67}$ where E = rate of emission in pounds per hour; and P = process weight rate in tons per hour

(a) The allowable PM emission rate from the three (3) steel grit blasters shall not exceed 2.91 pounds per hour per blaster when operating at a total process weight rate of 1200 pounds per hour per blaster.

(b) The allowable PM emission rate from ALOX-1 shall not exceed 2.91 pounds per hour when operating at a total process weight rate of 1200 pounds per hour.

Compliance Determination Requirements

D.3.2 Testing Requirements [326 IAC 2-7-6(1),(6)]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the PM limit specified in Condition D.3.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.3.3 Particulate Matter (PM)

The baghouses for PM control shall be in operation at all times when the three (3) steel grit blasters and ALOX-1 are in operation.

SECTION D.4 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]

One (1) open top degreaser, identified as DG, with a maximum trichloroethylene consumption rate of 12 gallons per day which exhausts internally.

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.4.1 General Provisions Relating to HAPs [326 IAC 20-1-1][40 CFR Part 63, Subpart A]

The provisions of 40 CFR Part 63, Subpart A - General Provisions, which are incorporated as 326 IAC 20-1-1, apply to the facility described in this section except when otherwise specified in 40 CFR Part 63, Subpart T.

D.4.2 Open Top Vapor Degreaser Operations and Control [326 IAC 8-3-3] [326 IAC 8-3-6]

(a) The Permittee shall ensure that the following control equipment requirements are met:

(1) Equip DG with a cover that can be opened and closed easily without disturbing the vapor zone.

(2) Equip DG with the following switches:

(A) A condenser flow switch and thermostat which shuts off sump heat if condenser coolant stops circulating or becomes too warm.

(B) A spray safety switch which shuts off spray pump if the vapor level drops more than ten (10) centimeters (four (4) inches).

(3) Equip DG with a permanent, conspicuous label which lists the operating requirements outlined in subsection (b).

(4) Equip DG with one (1) of the following control devices:

(A) A freeboard ratio of seventy-five hundredths (0.75) or greater and a powered cover if the degreaser opening is greater than one (1) square meter (ten and eight-tenths (10.8) square feet).

(B) A refrigerated chiller.

(C) An enclosed design in which the cover opens only when the article is actually entering or exiting the degreaser.

(D) A carbon adsorption system with ventilation which, with the cover open, achieves a ventilation rate of greater than or equal to fifteen (15) cubic meters per minute per square meter (fifty (50) cubic feet per minute per square foot) of air to solvent interface area, and an average of less than twenty-five (25) parts per million of solvent is exhausted over one (1) complete adsorption cycle.

(E) Other systems of demonstrated equivalent or better control as those outlined above. Such systems shall be submitted to the U.S. EPA as a SIP revision.

(b) The Permittee shall ensure that the following operating requirements are met:

(1) Keep the cover closed at all times except when processing work loads through the degreaser.

(2) Minimize solvent carryout emissions by:

(A) Racking articles to allow complete drainage;

(B) Moving articles in and out of the degreaser at less than three and three-tenths (3.3) meters per minute (eleven (11) feet per minute).

(3) Prohibit the entrance into the degreaser of porous or absorbent materials such as, but not limited to, cloth, leather, wood, or rope.

(4) Prohibit the occupation of more than one-half (½) of the degreaser's open top area with the workload.

(5) Prohibit the loading of the degreaser to the point where the vapor level would drop more than ten (10) centimeters (four (4) inches) when the workload is removed.

(6) Prohibit solvent spraying above the vapor level.

(7) Repair solvent leaks immediately, or shut down the degreaser if leaks cannot be repaired immediately.

(8) Store waste solvent only in covered containers and prohibit the disposal or transfer of waste solvent in any manner in which greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere.

(9) Prohibit the exhaust ventilation rate from exceeding twenty (20) cubic meters per minute per square meter (sixty-five (65) cubic feet per minute per square foot) of degreaser opening unless a greater ventilation rate is necessary to meet Occupational Safety and Health Administration (OSHA) requirements.

(10) Prohibit the use workplace fans near the degreaser opening.

(11) Prohibit visually detectable water in the solvent exiting the water separator.

D.4.3 Halogenated Solvent Cleaning Machine NESHAP [40 CFR Part 63, Subpart T]

This facility is subject to 40 CFR Part 63, Subpart T, (Halogenated Solvent Cleaning Machine NESHAP), which is incorporated by reference as 326 IAC 20-6-1. A copy of the rule is attached.

(a) Pursuant to 40 CFR 63.463, the following design requirements for DG are applicable:

(1) DG shall be designed or operated such that, it has an idling and downtime mode cover, as described in 40 CFR 63.463(d)(1)(i), that may be readily opened or closed, that completely covers the cleaning machine openings when in place, and is free of cracks, holes, and other defects.

(2) DG shall have a freeboard ratio of 0.75 or greater.

(3) DG shall have an automated parts handling system capable of moving parts or parts baskets at a speed of 3.4 meters per minutes (11 feet per minute) or less from the initial loading of parts through removal of cleaned parts.

(4) DG shall be equipped with a device that shuts off sump heat if the sump liquid solvent level drops to the sump heater coils.

(5) DG shall have a primary condenser.

(6) DG shall be equipped with a vapor level control device that shuts off sump heat if the vapor level rises above the height of the primary condenser.

(7) The Permittee is required to demonstrate that DG can achieve and maintain an idling emission limit of 0.22 kilograms per hour per square meter (0.045 pounds per hour per square foot) of solvent/air interface area as determined using Reference Method 307 in appendix A of this part.

(A) The Permittee shall conduct an initial performance test to demonstrate compliance with the applicable idling emission limit.

(B) The Permittee must establish parameters that will be monitored to demonstrate compliance.

(i) Ensure that the cover is in place whenever parts are not in the solvent cleaning machine and completely covers the cleaning machine openings when in place.

(ii) Ensure that the idling-mode cover is maintained free of cracks, holes, and other defects.

(iii) An exceedance has occurred if the requirements of (7)(B)(i) have not been met.

(iv) An exceedance has occurred if the requirements of (7)(B)(ii) have not been met and are not corrected within fifteen (15) days of detection.

Adjustments or repairs shall be made to the solvent cleaning system or control device to reestablish required levels. The parameter must be remeasured immediately upon adjustment or repair and demonstrated to be within required limits.

(C) Conduct the periodic monitoring of the parameters used to demonstrate compliance as described in 40 CFR 63.466 (f).

(D) Operate DG within parameters identified in the initial performance test.

(E) The Permittee shall report all exceedances and all corrections and adjustments made to avoid an exceedance as specified in 40 CFR 63.468 (h).

(b) Pursuant to 40 CFR 63.463, the following work and operational practices for DG are applicable:

(1) Control air disturbances across DG opening(s) by placing cover(s) to the solvent cleaning machine during the idling mode and the downtime mode unless either the solvent has been removed from the machine or maintenance or monitoring is being performed that requires the cover(s) to not be in place.

(2) The parts baskets or the parts being cleaned in DG shall not occupy more than 50 percent of the solvent/air interface area unless the parts baskets or parts are introduced at a speed of 0.9 meters per minute (3 feet per minute) or less.

(3) Any spraying operations shall be done within the vapor zone or within a section of the solvent cleaning machine that is not directly exposed to the ambient air.

(4) Parts shall be oriented so that the solvent drains from them freely. Parts having cavities or blind holes shall be tipped or rotated before being removed from any solvent cleaning machine unless an equally effective approach has been approved by the commissioner.

(5) Parts baskets or parts shall not be removed until dripping has stopped.

(6) During startup, the primary condenser shall be turned on before the sump heater.

(7) During shutdown, the sump heater shall be turned off and the solvent vapor layer allowed to collapse before the primary condenser is turned off.

(8) When solvent is added or drained, the solvent shall be transferred using threaded or other leak proof couplings and the end of the pipe in the solvent sump shall be located beneath the liquid solvent surface.

(9) Each solvent cleaning machine and associated controls shall be maintained as recommended by the manufacturers of the equipment or using alternative maintenance practices that have been demonstrated to the commissioner’s satisfaction to achieve the same or better results as those recommended by the manufacturer.

(10) Each operator shall complete and pass the applicable sections of the test of solvent cleaning operating procedures in appendix B of 40 CFR 63, if requested during an inspection by the commissioner.

(11) Waste solvents, still bottoms, and sump bottoms shall be collected and stored in closed containers. The closed containers may contain a device that would allow pressure relief, but would not allow liquid solvent to drain from the container.

(12) Sponges, fabric, wood, and paper products shall not be cleaned.

D.4.4 PSD Minor Limit [326 IAC 2-2] [40 CFR 52.21]

The VOC input of the above listed facility in Section D.4 (DG), and the facilities listed in Section D.2 (DC-1, DS-1, RCP, SB-1-SB-4 and COE-1-COE-4) shall be limited to less than 250 tons per twelve consecutive month period. This production limitation is equivalent to a VOC potential to emit of less than 250 tons per twelve (12) consecutive month period, therefore, the Prevention of Significant Deterioration (PSD) rules, 326 IAC 2-2 and 40 CFR 52.21, will not apply.

D.4.5 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for DG and any control devices.

Compliance Determination Requirements

D.4.6 Testing Requirements [326 IAC 2-7-6(1)]

(a) The Permittee shall determine the idling emission rate of the solvent cleaning machine using reference method 307 in Appendix A to this part.

(b) Based on the results of an idling emissions test conducted between January 15, 1999 and January 17, 1999, the idling emission rate was found to be 0.0104 pounds per square feet per hour of solvent/air interface area, which is less than the 0.045 pounds per hour per square foot of solvent/air interface area required by the NESHAP. Therefore, DG meets the NESHAP requirements.

(c) IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the VOC limit specified in Condition D.4.3 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.4.7 Monitoring Requirements

(a) The Permittee shall conduct a visual inspection to determine if the cover is opening and closing properly, completely covers the cleaning machine openings when closed, and is free of cracks, holes, and other defects. These results shall be recorded on a monthly basis.

(b) The Permittee shall determine the hoist speed by measuring the time it takes for the hoist to travel a measured distance. The speed is equal to the distance in meters divided by the time in minutes (meters per minute).

(1) If an exceedance of the hoist speed occurs during quarterly monitoring, the monitoring frequency returns to monthly until another year of compliance without and exceedance is demonstrated.

(2) If the Permittee can demonstrate to IDEM, OAM's satisfaction in the initial compliance report that the hoist cannot exceed a speed of 3.4 meters per minute (11 feet per minute), the required monitoring frequency is quarterly, including during the first year of compliance.

Recordkeeping and Reporting Requirements [326 IAC 2-7-5(3)][326 IAC 2-7-19

D.4.8 Recordkeeping Requirements

(a) The Permittee shall maintain, in written or electronic form, records of the following information specified below, for the life time of the machine,

(1) Owners's manuals, or if not available, written maintenance and operating procedures, for the solvent cleaning machine and control equipment.

(2) The date of installation of the solvent cleaning machine and all of its control devices. If the exact date of the installation is not known, a letter certifying that the cleaning machine and its control devices were installed prior to, or on, November 29, 1993, or after November 29, 1993, may be substituted.

(3) Records of the halogenated HAP solvent content for each solvent used in a solvent cleaning machine.

(b) The Permittee shall maintain, in written or electronic form, records of the following information specified below for a period of 5 years:

(1) The results of control device monitoring required under 40 CFR63.466.

(2) Information on the actions taken to comply with 40 CFR63.463(e) and (f). This information shall include records of written or verbal orders for replacement parts, a description of the repairs made, and additional monitoring conducted to demonstrate that monitored parameters have returned to accepted levels.

(3) Estimates of annual solvent consumption for each solvent cleaning machine.

D.4.9 Reporting Requirements

A summary of the information to document compliance with Condition D.4.3 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, and to the following address:

United States Environmental Protection Agency, Region V
Air and Radiation Division, Air Enforcement Branch - Indiana (AE-17J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

(a) An initial notification report for DG was submitted on December 7, 1998.

(b) An idling emissions test report demonstrating compliance for DG was submitted on January 25, 1999. Please submit an initial statement of compliance for DG upon issuance of this permit. This statement shall include:

(1) The name and the address of the owner or operator.

(2) The address (i.e., physical location) of the solvent cleaning machine(s).

(3) A list of the control equipment used to achieve compliance for solvent cleaning machine.

(4) For each piece of control equipment required to be monitored, a list of the parameters that are monitored and the values of these parameters measured on or during the first month after the compliance date.

(c) The Permittee shall submit an annual report by February 1 of the year following the one for which the reporting is being made. This report shall include the requirements as follows:

(1) A signed statement from the facility owner or his designee stating that, "All operators of solvent cleaning machines have received training on the proper operation of solvent cleaning machines and their control devices sufficient to pass the test required in 40 CFR 63.463 (d)(10)."

(2) An estimate of solvent consumption for each solvent cleaning machine during the reporting period.

(d) The Permittee shall submit an exceedance report to the commissioner semiannually using the Semi-Annual Compliance Monitoring Report form provided with this permit, except when, the commissioner determines, on a case-by-case basis that more frequent reporting is necessary to accurately assess the compliance status of the source or, an exceedance occurs. Once an exceedance has occurred the Permittee shall follow a quarterly reporting format until a request to reduce reporting frequency under paragraph 40 CFR63.468 (i) of this section is approved. Exceedance reports shall be delivered or postmarked by the 30th day following the end of each calender half or quarter, as appropriate. The exceedance report shall include the applicable information as given below:

(1) Information on the actions taken to comply with 40 CFR63. 463(e) and (f). This information shall include records of written or verbal orders for replacement parts, a description of the repairs made, and additional monitoring conducted to demonstrate that monitored parameters have returned to accepted levels.

(2) If an exceedance has occurred, the reason for the exceedance and a description of the actions taken.

(3) If no exceedances of a parameter have occurred, or a piece of equipment has not been inoperative, out of control, repaired, or adjusted, such information shall be stated in the report.

(e) Pursuant to 40 CFR63.463 (i), the Permittee who is required to submit an exceedance report on a quarterly (or more frequent) basis may reduce the frequency of reporting to semiannual if the following conditions are met:

(1) The source has demonstrated a full year of compliance without an exceedance.

(2) The Permittee continues to comply with all relevant recordkeeping and monitoring requirements specified in Subpart A (General Provisions) and in 40 CFR 63, Subpart T

(3) The commissioner does not object to a reduced frequency of reporting for the affected source as provided in paragraphs (e)(3)(iii) of Subpart A (General Provisions) of 40 CFR 63.

SECTION D.5 FACILITY CONDITIONS

Facility Description [326 IAC 2-7-5(15)]

(a) One (1) HVLP chain on edge machine, designated as COE-5, with VOC emissions controlled by thermal oxidizer, CE-3, with the following equipment:

(1) Two (2) coating booths with a maximum topcoat application rate of 18.70 pounds per hour, which exhausts to one (1) stack designated as C3.

(2) One (1) primer booth with a maximum primer application rate of 4.27 pounds per hour, which exhausts to one (1) stack designated as C3.

(3) One (1) electric heater which exhausts to one (1) stack designated as C3.

THIS SECTION OF THE PERMIT IS BEING ISSUED UNDER THE PROVISIONS OF 326 IAC 2-1 AND 326 IAC 2-7-10.5, WITH CONDITIONS LISTED BELOW.

Construction Conditions

General Construction Conditions

D.5.1 This permit to construct does not relieve the Permittee of the responsibility to comply with the provisions of the Indiana Environmental Management Law (IC 13-11 through 13-20; 13-22 through 13-25; and 13-30), the Air Pollution Control Law (IC 13-17) and the rules promulgated thereunder, as well as other applicable local, state, and federal requirements.

Effective Date of the Permit

D.5.2 Pursuant to IC 13-15-5-3, this section of this permit becomes effective upon its issuance.

Operation Conditions

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.5.3 Volatile Organic Compounds (VOC) [326 IAC 8-2-9]

(a) Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), no owner or operator of a facility engaged in the surface coating of miscellaneous metal parts or products may cause, allow, or permit the discharge into the atmosphere of any volatile organic compounds in excess of 3.5 pounds of VOC per gallon of coating less water.

(b) When operating the thermal oxidizer, CE-3, to achieve the limit established under 326 IAC 8-2-9 (3.5 pounds of VOC emitted to the atmosphere per gallon of coating less water) the thermal oxidizer shall maintain a minimum 94.1% capture efficiency and a minimum 98% destruction efficiency of the VOC captured. These efficiencies and the use of the thermal oxidizer are required by 326 IAC 8-1-2 (a)(2). Based upon 326 IAC 8-1-2(c) and the overall control efficiency of 92.2%, the VOC content of the coating per gallon of solids delivered to the facilities listed above in Section D.5 (COE-5), the following facilities listed in Section D.1 (DC-2, DC-3, DC-4, and DS-2), and the following facilities listed in Section D.2 (RCP, COE-3 and COE-4) shall be limited to 67.8.

This overall efficiency of 92.2% shall be maintained in order to demonstrate compliance with 326 IAC 8-2-9 and 326 IAC 8-1-2(a)(2).

D.5.4 New Source Toxics Control [326 IAC 2-1-3.4]

The allowable HAP emissions shall be based on the Maximum Achievable Control Technology (MACT) analysis determined by the Office of Air Management. The MACT for the facilities listed above in Section D.5 (COE-5), shall be the use of the thermal oxidizer, CE-3, as described in Condition D.1.1(b), in combination with the use of HVLP application. The overall efficiency of this control device shall be 92.2%.

D.5.5 PSD Modification [326 IAC 2-2] [40 CFR 52.21]

Any change or modification which may increase the VOC PTE of COE-5 and DC-2, DC-3, DC-4, DS-2, CE-3 (listed in Section D.1) to greater than 249 tons per year, shall require prior approval from the Office of Air Management before such change may occur.

D.5.6 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for COE-5 and any control devices (CE-3).

Compliance Determination Requirements

D.5.7 Testing Requirements [326 IAC 2-7-6(1),(6)]

(a) Testing of this facility is specifically required by this permit and pursuant to CP No. 069-9246-00018, issued on September 25, 1998. Compliance with the control efficiency and minimum operating temperature specified in Condition D.5.3(b) shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

(b) Pursuant to CP No. 069-9246-00018, issued on September 25, 1998, during the period within 60 days after achieving maximum production rate, but no later than 180 days after initial start-up, a performance test shall be required to demonstrate that the source is complying with 326 IAC 8-2-9.

(1) If the oxidizer is determined to demonstrate compliance, the required temperature and control efficiency shall be specified.

(2) If the oxidizer is determined to not demonstrate compliance, the efficiency needed to comply with 326 IAC 8-2-9 shall be determined by the performance test.

(3) The source shall be required to comply with the required control efficiency as determined by the performance test.

(c) This test shall be repeated at least once every two and one-half (2.5) years from the date of this valid compliance demonstration. In addition to these requirements, IDEM may require compliance testing when necessary to determine if the facility is in compliance.

D.5.8 Volatile Organic Compounds (VOC)

Compliance with the VOC content and usage limitations contained in Condition D.5.3 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer. IDEM, OAM, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.5.9 Recuperative Thermal Oxidizer Operations

(a) When operating the thermal oxidizer to achieve the limit established under 326 IAC 8-2-9, 3.5 pounds of VOC per gallon of coating less water, the thermal oxidizer shall maintain a minimum operating temperature of 1400° F, or a minimum operating temperature as determined by the most recent compliance test, to maintain a minimum 94.1% capture efficiency and a 98% destruction efficiency of the volatile organic compounds captured. The recuperative thermal oxidizer shall operate at all times, to demonstrate compliance with Conditions D.5.3 and D.5.4, when COE-5 is in operation.

(b) Any change or modification which may increase the VOC actual emissions to 250 tons per year or more shall require prior approval from OAM before such change may occur.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.5.10 Record Keeping Requirements

(a) To document compliance with Conditions D.5.3 and D.5.4, the Permittee shall maintain records in accordance with (1) through (7) below. Records maintained for (1) through (7) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC and HAPs usage limits and the VOC and HAPs emission limits established in Conditions D.5.3 and D.5.4.

(1) The amount of VOC and HAP content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;

(2) A log of the dates of use;

(3) The monthly volume weighted VOC content of the coatings as applied;

(4) The cleanup solvent usage for each month;

(5) The total VOC usage for each month;

(6) The total HAPs usage for each month; and

(7) Monthly emissions in pounds of VOC and HAPs.

(b) To document compliance with Condition D.5.3 (b), records of the minimum operating temperature shall be maintained daily.

(c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.5.11 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.5.3 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION

PART 70 OPERATING PERMIT CERTIFICATION

Source Name: Ken-Koat, Inc.
Source Address: 1605 Riverfork Drive East, Huntington, Indiana 46750
Mailing Address: 1605 Riverfork Drive East, Huntington, Indiana 46750
Part 70 Permit No.: 069-7676-00018

This certification shall be included when submitting monitoring, testing reports/results or other documents as required by this permit.

Please check what document is being certified:

9 Annual Compliance Certification Letter

9 Test Result (specify) _____

9 Report (specify) _____

9 Notification (specify) _____

9 Other (specify) _____

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature:

Printed Name:

Title/Position:

Date:

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT

COMPLIANCE DATA SECTION
P.O. Box 6015
100 North Senate Avenue
Indianapolis, Indiana 46206-6015
Phone: 317-233-5674
Fax: 317-233-5967

PART 70 OPERATING PERMIT
EMERGENCY/DEVIATION OCCURRENCE REPORT

Source Name: Ken-Koat, Inc.
Source Address: 1605 Riverfork Drive East, Huntington, Indiana 46750
Mailing Address: 1605 Riverfork Drive East, Huntington, Indiana 46750
Part 70 Permit No.: 069-7676-00018

This form consists of 2 pages **Page 1 of 2**

Check either No. 1 or No.2
9 1. This is an emergency as defined in 326 IAC 2-7-1(12) C The Permittee must notify the Office of Air Management (OAM), within four (**4**) business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and C The Permittee must submit notice in writing or by facsimile within two (**2**) days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16
9 2. This is a deviation, reportable per 326 IAC 2-7-5(3)(c) C The Permittee must submit notice in writing within ten (**10**) calendar days

If any of the following are not applicable, mark N/A

Facility/Equipment/Operation:
Control Equipment:
Permit Condition or Operation Limitation in Permit:
Description of the Emergency/Deviation:
Describe the cause of the Emergency/Deviation:

If any of the following are not applicable, mark N/A **Page 2 of 2**

Date/Time Emergency/Deviation started:
Date/Time Emergency/Deviation was corrected:
Was the facility being properly operated at the time of the emergency/deviation? Y N Describe:
Type of Pollutants Emitted: TSP, PM-10, SO_2, VOC, NO_X, CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency/deviation:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by: _____
Title / Position: _____
Date: _____
Phone: _____

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION

Part 70 Quarterly Report

Source Name: Ken-Koat, Inc.
Source Address: 1605 Riverfork Drive East, Huntington, Indiana 46750
Mailing Address: 1605 Riverfork Drive East, Huntington, Indiana 46750
Part 70 Permit No.: 069-7676-00018
Facility: DS-1
Parameter: VOC PTE
Limit: less than 25 tons per twelve (12) consecutive month period

YEAR: _____

Month	Column 1	Column 2	Column 1 + Column 2
	VOC Usage (tons/month) *This Month*	VOC Usage (tons) *Previous 11 Months*	VOC Usage (tons) *12 Month Total*
Month 1			
Month 2			
Month 3			

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.
Deviation has been reported on: _____

Submitted by: _____
Title / Position: _____
Signature: _____
Date: _____
Phone: _____

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION

Part 70 Quarterly Report

Source Name: Ken-Koat, Inc.
Source Address: 1605 Riverfork Drive East, Huntington, Indiana 46750
Mailing Address: 1605 Riverfork Drive East, Huntington, Indiana 46750
Part 70 Permit No.: 069-7676-00018
Facility: COE-1
Parameter: VOC PTE
Limit: less than 25 tons per twelve (12) consecutive month period

YEAR: _____

Month	Column 1	Column 2	Column 1 + Column 2
	VOC Usage (tons/month) *This Month*	VOC Usage (tons) *Previous 11 Months*	VOC Usage (tons) *12 Month Total*
Month 1			
Month 2			
Month 3			

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.
Deviation has been reported on: _____

Submitted by: _____
Title / Position: _____
Signature: _____
Date: _____
Phone: _____

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION

Part 70 Quarterly Report

Source Name: Ken-Koat, Inc.
Source Address: 1605 Riverfork Drive East, Huntington, Indiana 46750
Mailing Address: 1605 Riverfork Drive East, Huntington, Indiana 46750
Part 70 Permit No.: 069-7676-00018
Facility: COE-2
Parameter: VOC PTE
Limit: less than 25 tons per twelve (12) consecutive month period

YEAR: _____

Month	Column 1	Column 2	Column 1 + Column 2
	VOC Usage (tons/month) *This Month*	VOC Usage (tons) *Previous 11 Months*	VOC Usage (tons) *12 Month Total*
Month 1			
Month 2			
Month 3			

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.
Deviation has been reported on: _____

Submitted by: _____
Title / Position: _____
Signature: _____
Date: _____
Phone: _____

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION

Part 70 Quarterly Report

Source Name: Ken-Koat, Inc.
Source Address: 1605 Riverfork Drive East, Huntington, Indiana 46750
Mailing Address: 1605 Riverfork Drive East, Huntington, Indiana 46750
Part 70 Permit No.: 069-7676-00018
Facility: SB-1
Parameter: VOC PTE
Limit: less than 25 tons per twelve (12) consecutive month period

YEAR: _____

Month	Column 1	Column 2	Column 1 + Column 2
	VOC Usage (tons/month) *This Month*	VOC Usage (tons) *Previous 11 Months*	VOC Usage (tons) *12 Month Total*
Month 1			
Month 2			
Month 3			

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.
Deviation has been reported on: _____

Submitted by: _____
Title / Position: _____
Signature: _____
Date: _____
Phone: _____

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION

Part 70 Quarterly Report

Source Name: Ken-Koat, Inc.
Source Address: 1605 Riverfork Drive East, Huntington, Indiana 46750
Mailing Address: 1605 Riverfork Drive East, Huntington, Indiana 46750
Part 70 Permit No.: 069-7676-00018
Facility: SB-2
Parameter: VOC PTE
Limit: less than 25 tons per twelve (12) consecutive month period

YEAR: _____

Month	Column 1	Column 2	Column 1 + Column 2
	VOC Usage (tons/month) *This Month*	VOC Usage (tons) *Previous 11 Months*	VOC Usage (tons) *12 Month Total*
Month 1			
Month 2			
Month 3			

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.
Deviation has been reported on: _____

Submitted by: _____
Title / Position: _____
Signature: _____
Date: _____
Phone: _____

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION

Part 70 Quarterly Report

Source Name: Ken-Koat, Inc.
Source Address: 1605 Riverfork Drive East, Huntington, Indiana 46750
Mailing Address: 1605 Riverfork Drive East, Huntington, Indiana 46750
Part 70 Permit No.: 069-7676-00018
Facility: SB-3
Parameter: VOC PTE
Limit: less than 25 tons per twelve (12) consecutive month period

YEAR: _____

Month	Column 1	Column 2	Column 1 + Column 2
	VOC Usage (tons/month) *This Month*	VOC Usage (tons) *Previous 11 Months*	VOC Usage (tons) *12 Month Total*
Month 1			
Month 2			
Month 3			

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.
Deviation has been reported on: _____

Submitted by: _____
Title / Position: _____
Signature: _____
Date: _____
Phone: _____

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION

Part 70 Quarterly Report

Source Name: Ken-Koat, Inc.
Source Address: 1605 Riverfork Drive East, Huntington, Indiana 46750
Mailing Address: 1605 Riverfork Drive East, Huntington, Indiana 46750
Part 70 Permit No.: 069-7676-00018
Facility: SB-4
Parameter: VOC PTE
Limit: less than 25 tons per twelve (12) consecutive month period

YEAR: _____

Month	Column 1	Column 2	Column 1 + Column 2
	VOC Usage (tons/month) *This Month*	VOC Usage (tons) *Previous 11 Months*	VOC Usage (tons) *12 Month Total*
Month 1			
Month 2			
Month 3			

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.
Deviation has been reported on: _____

Submitted by: _____
Title / Position: _____
Signature: _____
Date: _____
Phone: _____

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION

Part 70 Quarterly Report

Source Name: Ken-Koat, Inc.
Source Address: 1605 Riverfork Drive East, Huntington, Indiana 46750
Mailing Address: 1605 Riverfork Drive East, Huntington, Indiana 46750
Part 70 Permit No.: 069-7676-00018
Facility: SB-1, SB-2, SB-3, SB-4, DS-1, COE-1, COE-2, COE-3, COE-4, RCP, DC-1, & DG.
Parameter: VOC PTE
Limit: less than 250 tons per twelve (12) consecutive month period

YEAR: _____

Month	Column 1	Column 2	Column 1 + Column 2
	VOC Usage (tons/month) *This Month*	VOC Usage (tons) *Previous 11 Months*	VOC Usage (tons) *12 Month Total*
Month 1			
Month 2			
Month 3			

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.
Deviation has been reported on: _____

Submitted by: _____
Title / Position: _____
Signature: _____
Date: _____
Phone: _____

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION

PART 70 OPERATING PERMIT
QUARTERLY COMPLIANCE MONITORING REPORT

Source Name: Ken-Koat, Inc.
Source Address: 1605 Riverfork Drive East, Huntington, Indiana 46750
Mailing Address: 1605 Riverfork Drive East, Huntington, Indiana 46750
Part 70 Permit No.: 069-7676-00018

Months: _____ to _____ Year: _____

This report is an affirmation that the source has met all the compliance monitoring requirements stated in this permit. This report shall be submitted quarterly. Any deviation from the compliance monitoring requirements and the date(s) of each deviation must be reported. Additional pages may be attached if necessary. This form can be supplemented by attaching the Emergency/Deviation Occurrence Report. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".

9 NO DEVIATIONS OCCURRED THIS REPORTING PERIOD

9 THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD.

Compliance Monitoring Requirement (e.g. Permit Condition D.1.3)	**Number of Deviations**	**Date of each Deviation**

Form Completed By: _____
Title/Position: _____
Date: _____
Phone: _____

Attach a signed certification to complete this report.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION

PART 70 OPERATING PERMIT
SEMI-ANNUAL COMPLIANCE MONITORING REPORT

Source Name: Ken-Koat, Inc.
Source Address: 1605 Riverfork Drive East, Huntington, Indiana 46750
Mailing Address: 1605 Riverfork Drive East, Huntington, Indiana 46750
Part 70 Permit No.: 069-7676-00018

Months: _____ to _____ Year: _____

This report is an affirmation that the source has met all the compliance monitoring requirements stated in this permit. This report shall be submitted semi-annually. Any deviation from the compliance monitoring requirements and the date(s) of each deviation must be reported. Additional pages may be attached if necessary. This form can be supplemented by attaching the Emergency/Deviation Occurrence Report. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".

9 NO DEVIATIONS OCCURRED THIS REPORTING PERIOD

9 THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD.

Compliance Monitoring Requirement (e.g. Permit Condition D.1.3)	**Number of Deviations**	**Date of each Deviation**

Form Completed By: _____
Title/Position: _____
Date: _____
Phone: _____

Attach a signed certification to complete this report.

Indiana Department of Environmental Management
Office of Air Management

Technical Support Document (TSD) for a Part 70 Operating Permit

Source Background and Description

Source Name:	**Ken-Koat, Inc.**
Source Location:	**1605 Riverfork Drive East, Huntington, Indiana 46750**
County:	**Huntington**
Operation Permit No.:	**T069-7676-00018**
SIC Code:	**3479**
Permit Reviewer:	**Felicity L. Lao**

The Office of Air Management (OAM) has reviewed an application from Ken-Koat, Inc. relating to a metal coating operation.

Permitted Emission Units and Pollution Control Equipment

The source consists of the following permitted emission units and pollution control devices:

(a) One (1) dip and spin for metal inserts, designated as DS-1, with a maximum adhesive application rate of 5.68 pounds per hour, which exhausts to one (1) stack designated as S-18.

(b) One (1) dip and spin, designated as DS-2, with emissions controlled by thermal oxidizer, CE-3, with the following equipment:

(1) One (1) coating tank with a maximum topcoat application rate of 17.97 pounds per hour, which exhausts to one (1) stack designated as C3.

(2) One (1) primer tank with a maximum primer application rate of 4.10 pounds per hour, which exhausts to one (1) stack designated as C3.

(3) One (1) electric heater, which exhausts to one (1) stack designated as C3.

(c) One (1) dip conveyor, designated as DC-1, with a maximum application rate of 34.93 pounds per hour, which utilizes one (1) dryer, and is controlled by thermal oxidizer, CE-3, which exhausts to one (1) stack designated as C3.

(d) One (1) dip conveyor, designated as DC-2, with emissions controlled by thermal oxidizer, CE-3, with the following equipment:

(1) One (1) coating tank with a maximum topcoat application rate of 11.73 pounds per hour, which exhausts to a stack designated as C3.

(2) One (1) primer tank with a maximum primer application rate of 5.32 pounds per hour, which exhausts to one (1) stack designated as C3.

(3) One (1) natural gas drying oven designated as OVEN-1, with a maximum heat input rate of 0.70 million Btu per hour, which exhausts to one (1) stack designated as C3.

(e) One (1) dip conveyor designated as DC-3, with emissions controlled by thermal oxidizer, CE-3, with the following equipment:

(1) One (1) coating tank with a maximum topcoat application rate of 19.06 pounds per hour, which exhausts to one (1) stack designated as C3.

(2) One (1) primer tank with a maximum primer application rate of 4.29 pounds per hour, which exhausts to one (1) stack designated as C3.

(3) One (1) natural gas drying oven designated as OVEN-2, with a maximum heat input rate of 0.70 million Btu per hour, which exhausts to one (1) stack designated as C3.

(f) One (1) dip conveyor designated as DC-4, with emissions controlled by thermal oxidizer, CE-3, with the following equipment:

(1) One (1) coating tank with a maximum topcoat application rate of 17.60 pounds per hour, which exhausts to one (1) stack designated as C3.

(2) One (1) primer tank with a maximum primer application rate of 3.96 pounds per hour, which exhausts to one (1) stack designated as C3.

(3) One (1) natural gas drying oven, designated as OVEN-2, with a maximum heat input rate of 0.70 million Btu per hour, which exhausts to one (1) stack designated as C3.

(g) One (1) ransburg coating process, designated as RCP, controlled by the thermal oxidizer, CE-3, with a maximum metal insert rate of 1000 pounds per hour with the following equipment:

(1) Two (2) electrostatic paint booths, designated as EPB-1 and EPB-2 respectively, each with a maximum application rate of 11.42 pounds per hour, each equipped with dry filters for particulate matter control, and each exhausting to one (1) stack designated as S-14 and S-15 respectively.

(2) One (1) natural gas fired oven, designated as OVEN-3, which exhausts to one (1) stack, designated as C4.

(h) Four (4) HVLP spray booths for painting metal inserts, designated as SB-1, SB-2, SB-3 and SB-4, with a maximum adhesive application rate of 5.94 pounds per hour, 11.91 pounds per hour, 4.92 pounds per hour and 4.38 pounds per hour, respectively. All are equipped with dry filters for particulate matter control. SB-1 exhausts to one (1) stack designated as S-10, SB-2 exhausts to one (1) stack designated as S-11, SB-3 exhausts to one (1) stack designated as S-1, and SB-4 exhausts to one (1) stack designated as S-2.

(i) One (1) open top degreaser, identified as DG, with a maximum trichloroethylene consumption rate of 12 gallons per day which exhausts internally.

(j) Three (3) steel grit blasters, designated as SGB-1, SGB-2, and SGB-3, each with a maximum metal insert throughput of 1200 pounds per hour, controlled by a baghouse designated as CE-1, exhausting to one (1) stack designated as C1.

(k) One (1) aluminum oxide grit blaster, identified as ALOX-1, with a maximum metal insert throughput of 1200 pounds per hour, controlled by a baghouse designated as CE-2 and exhausting to a stack designated as C2.

(l) Four (4) HVLP chain on edge machines, designated as COE-1, COE-2, COE-3 and COE-4, with a maximum adhesive application rate of 9.38 pounds per hour, 2.2 pounds per hour, 21.51 pounds per hour and 16.08 pounds per hour, respectively. Each chain on edge machine is equipped with dry filters for particulate matter control. COE-1 exhausts to two (2) stacks designated as S-12 and S-13. COE-2 exhausts to one (1) stack designated as S-6. COE-3 exhausts to three (3) stacks designated as S-3, S-4 and S-5, and COE-4 exhausts to three (3) stacks S-22, S-23 and S-24, each utilizing the thermal oxidizer, CE-3, to control VOC emissions.

Unpermitted Emission Units and Pollution Control Equipment

There are no unpermitted facilities operating at this source during this review process.

New Emission Units and Pollution Control Equipment Receiving Prior Approval

The application includes information relating to the prior approval for the construction and operation of the following equipment pursuant to 326 IAC 2-7-5(16):

(a) One (1) HVLP chain on edge machine, designated as COE-5, with VOC emissions controlled by thermal oxidizer, CE-3, with the following equipment:

(1) Two (2) coating booths with a maximum topcoat application rate of 18.70 pounds per hour, which exhausts to one (1) stack designated as C3.

(2) One (1) primer booth with a maximum primer application rate of 4.27 pounds per hour, which exhausts to one (1) stack designated as C3.

(3) One (1) electric heater which exhausts to one (1) stack designated as C3.

Insignificant Activities

The source also consists of the following insignificant activities, as defined in 326 IAC 2-7-1(21):

(a) Natural gas-fired combustion sources with heat input equal to or less than ten (10) million Btu per hour:

(1) One (1) natural gas boiler with a maximum heat input capacity of 5.23 million Btu per hour.

(2) One (1) burn-off oven, designated as BURN, maximum heat input capacity of 1 million Btu per hour, ventilated to an afterburner with 90% control efficiency, which exhausts to one (1) stack designated as C4.

(3) One (1) natural gas fired thermal oxidizer designated as CE-3, with a maximum heat input capacity of 6.00 million Btu per hour, with a minimum oxidizing zone temperature of 1400^{o}F.

(b) Infrared cure equipment

(c) Activities associated with the treatment of wastewater streams with an oil and grease content less than or equal to 1% by volume.

(d) Any operation using aqueous solutions containing less than 1% by weight of VOCS excluding HAPs.

(e) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment.

(f) Paved and unpaved roads and parking lots with public access.

(g) Other activities or categories not previously identified:

Insignificant Thresholds:

Lead (Pb) = 0.6 ton/year or 3.29 lbs/day	Carbon Monoxide (CO) = 25 lbs/day
Sulfur Dioxides (SO2) = 5 lbs/hour or 25 lbs/day	Particulate Matter (PM) = 5 lbs/hour or 25 lbs/day
Nitrogen Oxides (NOX) = 5 lbs/hour or 25 lbs/day	Volatile Organic compounds (VOC) = 3 lbs/hour or 15 lbs/day

(1) Two (2) hand painting operations for metal inserts, designated as HPO1 and HPO2, each with a maximum adhesive application rate of 1.04 pounds per hour, coated by either brushes or a small dip pot, which exhausts indoors as fugitive VOC emissions.

(2) Two (2) phosphate cleaning lines, consisting of a series of washes and rinses, which exhausts to one (1) stack designated as S-26.

(3) Two (2) aluminum oxide grit blasters, designated as ALOX-2 and ALOX-3. The maximum metal insert throughput of ALOX-2 and ALOX-3 is 40 pounds per hour each and exhausts indoors as fugitive PM emissions.

Existing Approvals

The source has been operating under previous approvals including, but not limited to, the following:

(1) CP No. 069-9246-00018, issued on September 25, 1998.

All conditions from previous approvals were incorporated into this Part 70 permit except the following:

(1) CP No. 069-9246-00018, issued on September 25, 1998.

(a) “One (1) dip and spin designated as #3" has been replaced with a chain on edge machine, designated as COE-5. This replacement has a potential to emit increase of 11.33 tons per year of PM emissions. There is no increase in the VOC potential to emit because COE-5 will still use the thermal oxidizer, CE-3, for VOC control.

(b) Ken-Koat has changed their method of compliance for the degreasing NESHAP from compliance with an overall emission limit to compliance with an idling emission limit.

Enforcement Issue

This source has the following enforcement actions pending:

(1) Agreed Order A-2735, approved on March 7, 1997.

On March 7, 1997, the Indiana Department of Environmental Management found the source to have constructed and operated without a permit. At that time, it was also determined that the existing equipment was out of compliance with 326 IAC 8-2-9, according to Agreed Order A-2735.

Ken-Koat identified noncompliance in their TV application. This was resolved by Agreed Order A-2735, and by the issuance of CP No. 069-9246-00018.

At the time of this Part 70 review, no new enforcement actions are necessary.

Recommendation

The staff recommends to the Commissioner that the Part 70 permit be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An administratively complete Part 70 permit application for the purpose of this review was received on December 13, 1996.

A notice of completeness letter was mailed to the source on February 11, 1997.

Emissions Calculations

See Appendix A, page 1 of 1 (Emissions Calculation Spreadsheets) for calculations for the chain on edge machine designated as COE-5.

Potential To Emit

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as “the maximum capacity of a stationary source to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA.”

Pollutant	Potential To Emit (tons/year)
PM	greater than 250
PM-10	greater than 100, less than 250
SO_2	less than 100
VOC	greater than 250
CO	less than 100
NO_x	less than 100

Note: For the purpose of determining Title V applicability for particulates, PM-10, not PM, is the regulated pollutant in consideration.

HAP's	Potential To Emit (tons/year)
Methyl Isobutyl Ketone	greater than 10
Methyl Ethyl Ketone	greater than 10
Formaldehyde	less than 10
Toluene	greater than 10
Xylene	greater than 10
Carbon Tetrachloride	less than 10
Trichloroethylene	greater than 10
Ethyl Benzene	greater than 10
TOTAL	1503.85

(a) The potential to emit (as defined in 326 IAC 1-2-55) of VOCs is equal to or greater than 100 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7

(b) The potential to emit (as defined in 326 IAC 1-2-55) of any single HAP is equal to or greater than ten (10) tons per year and the potential emissions (as defined in 326 IAC 1-2-55) of a combination HAPs is greater than or equal to twenty-five (25) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.

Actual Emissions

The following table shows the actual emissions from the source. This information reflects Ken-Koat's 1996 OAM emission data.

Pollutant	Actual Emissions (tons/year)
PM	49.51
PM-10	12.79
SO_2	0.02
VOC	382.97
CO	0.68
NO_x	3.06
Methyl Isobutyl Ketone	3.66
Methyl Ethyl Ketone	4.41
Formaldehyde	0.01
Toluene	81.45
Xylene	27.27
Carbon Tetrachloride	0.08
Trichloroethylene	8.95
Ethyl Benzene	1.74

County Attainment Status

The source is located in Huntington County.

Pollutant	Status
TSP	attainment
PM-10	attainment
SO_2	attainment
NO_2	attainment
Ozone	attainment
CO	attainment
Lead	attainment

Volatile organic compounds (VOC) and oxides of nitrogen (NOx) are precursors for the formation of ozone. Therefore, VOC and NO_X emissions are considered when evaluating the rule applicability relating to the ozone standards. Huntington County has been designated as attainment or unclassifiable for ozone.

Limited Potential to Emit

The table below summarizes the total potential to emit, reflecting all limits, of the significant emission units.

	Limited Potential to Emit (tons/year)					
Process/facility	PM	PM-10	SO_2	VOC	CO	NO_X
*Existing Equipment				249		
**New Equipment				133.97		
SB-1				24		
SB-2				24		
SB-3				24		
SB-4				24		
COE-1				24		
COE-2				24		
DS-1				24		
Total Emissions				382.97		

*"Existing Equipment" referring to those emission units designated as such in CP No. 069-9246-00018, issued on September 25, 1998: SB-1-SB-4, DS-1, COE-1, COE-2, COE-4, RCP, DC-1, and DG.

**"New Equipment" referring to those emission units designated as such in CP No. 069-9246-00018, issued on September 25, 1998: DC-2-DC-4, DS-2, COE-3, and CE-3. The emissions from DS-3 (which is now COE-5) were also included in this VOC PTE limit.

Federal Rule Applicability

(a) There are no New Source Performance Standards (326 IAC 12) and 40 CFR Part 60 applicable to this facility.

(b) The open top degreaser is subject to the National Emission Standards for Hazardous Air Pollutants (NESHAPs) 326 IAC 14, (40 CFR Part 63 Subpart T, and 326 IAC 20-1-6) because the cleaning solvent used is 100% trichloroethylene.

The following design requirements for the degreasing operation are applicable:

(1) DG shall be designed or operated such that, it has an idling and downtime mode cover, as described in 40 CFR 63.463(d)(1)(i), that may be readily opened or closed, that completely covers the cleaning machine openings when in place, and is free of cracks, holes, and other defects.

(2) DG shall have a freeboard ratio of 0.75 or greater.

(3) DG shall have an automated parts handling system capable of moving parts or parts baskets at a speed of 3.4 meters per minutes (11 feet per minute) or less from the initial loading of parts through removal of cleaned parts.

(4) DG shall be equipped with a device that shuts off sump heat if the sump liquid solvent level drops to the sump heater coils.

(5) DG shall have a primary condenser.

(6) DG shall be equipped with a vapor level control device that shuts off sump heat if the vapor level rises above the height of the primary condenser.

(7) The Permittee is required to demonstrate that DG can achieve and maintain an idling emission limit of 0.22 kilograms per hour per square meter (0.045 pounds per hour per square foot) of solvent/air interface area as determined using Reference Method 307 in appendix A of this part.

(A) The Permittee shall conduct an initial performance test to demonstrate compliance with the applicable idling emission limit.

(B) The Permittee must establish parameters that will be monitored to demonstrate compliance.

(i) Ensure that the cover is in place whenever parts are not in the solvent cleaning machine and completely covers the cleaning machine openings when in place.

(ii) Ensure that the idling-mode cover is maintained free of cracks, holes, and other defects.

(iii) An exceedance has occurred if the requirements of (7)(B)(i) have not been met.

(iv) An exceedance has occurred if the requirements of (7)(B)(ii) have not been met and are not corrected within fifteen (15) days of detection. Adjustments or repairs shall be made to the solvent cleaning system or control device to reestablish required levels. The parameter must be remeasured immediately upon adjustment or repair and demonstrated to be within required limits.

(C) Conduct the periodic monitoring of the parameters used to demonstrate compliance as described in 40 CFR 63.466 (f).

(D) Operate DG within parameters identified in the initial performance test.

(E) The Permittee shall report all exceedances and all corrections and adjustments made to avoid an exceedance as specified in 40 CFR 63.468 (h).

The following work and operational practices for the degreasing operation are applicable:

(1) Control air disturbances across DG opening(s) by placing cover(s) to the solvent cleaning machine during the idling mode and the downtime mode unless either the solvent has been removed from the machine or maintenance or monitoring is being performed that requires the cover(s) to not be in place.

(2) The parts baskets or the parts being cleaned in DG shall not occupy more than 50 percent of the solvent/air interface area unless the parts baskets or parts are introduced at a speed of 0.9 meters per minute (3 feet per minute) or less.

(3) Any spraying operations shall be done within the vapor zone or within a section of the solvent cleaning machine that is not directly exposed to the ambient air.

(4) Parts shall be oriented so that the solvent drains from them freely. Parts having cavities or blind holes shall be tipped or rotated before being removed from any solvent cleaning machine unless an equally effective approach has been approved by the commissioner.

(5) Parts baskets or parts shall not be removed until dripping has stopped.

(6) During startup, the primary condenser shall be turned on before the sump heater.

(7) During shutdown, the sump heater shall be turned off and the solvent vapor layer allowed to collapse before the primary condenser is turned off.

(8) When solvent is added or drained, the solvent shall be transferred using threaded or other leak proof couplings and the end of the pipe in the solvent sump shall be located beneath the liquid solvent surface.

(9) Each solvent cleaning machine and associated controls shall be maintained as recommended by the manufacturers of the equipment or using alternative maintenance practices that have been demonstrated to the commissioner's satisfaction to achieve the same or better results as those recommended by the manufacturer.

(10) Each operator shall complete and pass the applicable sections of the test of solvent cleaning operating procedures in appendix B of 40 CFR 63, if requested during an inspection by the commissioner.

(11) Waste solvents, still bottoms, and sump bottoms shall be collected and stored in closed containers. The closed containers may contain a device that would allow pressure relief, but would not allow liquid solvent to drain from the container.

(12) Sponges, fabric, wood, and paper products shall not be cleaned.

State Rule Applicability - Entire Source

326 IAC 2-2 (Prevention of Significant Deterioration)

Pursuant to 326 IAC 2-2 (Prevention of Significant Deterioration) and 40 CFR 52.21, this source is a major source.

326 IAC 2-6 (Emission Reporting)

This source is subject to 326 IAC 2-6 (Emission Reporting), because it has the potential to emit more than one hundred (100) tons per year of VOCs. Pursuant to this rule, the owner/operator of the source must annually submit an emission statement for the source. The annual statement must be received by July 1 of each year and contain the minimum requirement as specified in 326 IAC 2-6-4. The submittal should cover the period defined in 326 IAC 2-6-2(8)(Emission Statement Operating Year).

326 IAC 5-1 (Opacity)

Pursuant to 326 IAC 5-1-2 (Opacity), except as provided in 326 IAC 5-1-3 (Temporary Exemptions), visible emissions shall meet the following, unless otherwise stated in this permit:

(a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

(b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings) as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor in a six (6) hour period.

State Rule Applicability - Individual Facilities

326 IAC 2-1-3.4 (New Source Toxics Control)

DC-2, DC-3, DC-4, DS-2, COE-5 and CE-3 are subject to 326 IAC 2-1-3.4 (MACT) because these facilities emit either a single HAP greater than 10 tons per year or a combination of HAPs greater than 25 tons per year.

The allowable emissions were determined based on a MACT analysis. The MACT for DC-2, DC-3, DC-4, DS-2, and COE-5 is to use a thermal oxidizer (CE-3) which has a capture efficiency of 94.1% and a destruction efficiency of 98%, in combination with the application method of dip coating. The after control emissions of HAPs were determined by OAM, and such after control emissions will be the HAP allowable emissions.

326 IAC 2-1-3.4 does not apply to SB-1, SB-2, SB-3, SB-4, DS-1, DC-1, SGB-1, SGB-2, SGB-3, COE-1, COE-2, COE-3COE-4, ALOX-1, RCP, and DG because these facilities were constructed before July 27, 1997.

326 IAC 2-2 (Prevention of Significant Deterioration)

(a) SB-1, SB-2, SB-3, SB-4, DS-1, DC-1, SGB-1, SGB-2, SGB-3, COE-1, COE-2, COE-3, COE-4, ALOX-1, RCP, and DG are subject to 326 IAC 2-2 because the potential VOC emissions from these facilities are greater than 250 tons per year. The source has agreed to limit these facilities to 249 tons per year.

(b) The VOC input of SB-1, SB-2, SB-3, SB-4, DS-1, DC-1, SGB-1, SGB-2, SGB-3, COE-1, COE-2, COE-3, COE-4, ALOX-1, RCP, and DG shall be limited to 249 tons per year, rolled on a monthly basis. This production limitation is equivalent to VOC emissions of 249 tons per year, rolled on a monthly basis. Therefore, the Prevention of Significant Deterioration (PSD) rules, 326 IAC 2-2 and 40 CFR 52.21, will not apply.

(c) The construction of DC-2, DC-3, DC-4, and DS-2 was a modification to an existing minor stationary source . This modification is not major because the emission increase is less than the PSD significant levels. Therefore, pursuant to 326 IAC 2-2, and 40 CFR 52.21, the PSD requirements do not apply. COE-5 was originally included in this modification as DS-3, therefore, the construction of COE-5 (instead of construction of DS-3) is a modification to an existing minor stationary source . This modification is not major because the emission increase is less than the PSD significant levels. Therefore, pursuant to 326 IAC 2-2, and 40 CFR 52.21, the PSD requirements do not apply.

(d) Pursuant to 326 IAC 2-2 (Prevention of Significant Deterioration) and 40 CFR 52.21, this source is a major source.

326 IAC 4-2 (Incinerator Requirements)

All incinerators shall:

(a) Consist of primary and secondary chambers or the equivalent;

(b) Be equipped with a primary burner unless burning wood products;

(c) Comply with 326 IAC 5-1 and 326 IAC 5-2;

(d) Be maintained properly as specified by the manufacturer and approved by IDEM, OAM;

(e) Be operated according tot he manufacturer's recommendations and only burn waste approved by IDEM, OAM;

(f) Comply with other state and/or local rules or ordinances regarding installation and operation of incinerators;

(g) Be operated so that emissions of hazardous materials including, but not limited to, viable pathogenic bacteria, dangerous chemicals or gases, or noxious odors are prevented;

(h) Not emit particulate matter in excess of:

(1) Incinerators with a maximum refuse-burning capacity of two hundred (200) or more pounds per hour: three-tenths (0.3) pounds of particulate matter per one thousand (1000) pounds of dry exhaust gas at standard conditions corrected to fifty percent (50%) excess air; or

(2) All other incinerators: five-tenths (0.5) pounds of particulate matter per one thousand (1000) pounds of dry exhaust gas at standard conditions corrected to fifty percent (50%) excess air; and

(i) Not create a nuisance or fire hazard.

326 IAC 6-2-4 (Particulate Emission Limitations for Sources of Indirect Heating)

Pursuant to 326 IAC 6-2-4 (Particulate Emission Limitations for Sources of Indirect Heating), particulate matter (PM) emissions from 5.23 million Btu per hour boiler shall be limited by the following equation:

$$Pt = \frac{1.09}{Q^{0.26}}$$

Where: Pt = Pounds of particulate matter emitted per million Btu (lb/mmBtu) heat input.
Q = Total source maximum operating capacity rating in million Btu per hour (mmBtu/hr) heat input. The maximum operating capacity at which the facility is operated or the nameplate capacity, whichever is specified in the facility's permit application, except when some lower capacity is contained in the facility's operation permit; in which case, the capacity specified in the operation permit shall be used.

For Q less than 10mmBtu/hr, Pt shall not exceed 0.6 lb/mmBtu. This is equivalent to 3.14 pounds per hour of PM.

326 IAC 6-3 (Process Operations)

(a) Pursuant to 326 IAC 6-3 (Process Operations),

(1) The allowable PM emission rate from SGB-1, SGB-2, and SGB-3 shall each not exceed 2.91 pounds per hour;
(2) The allowable PM emission rate from ALOX-1 shall not exceed 2.91 pounds per hour;
(3) The allowable PM emission rate from ALOX-2 and ALOX -3 shall each not exceed 0.298 pounds per hour; and
(4) The allowable PM emission rate from SB-1, SB-2, SB-3, SB-4, RCP, COE-1, COE-2, COE-3 COE-4 and COE-5 shall not exceed the allowable PM emission rate based on the following equation:

Interpolation and extrapolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

$E = 4.10\ P^{0.67}$ where E = rate of emission in pounds per hour; and P = process weight rate in tons per hour

(b) The three (3) aluminum oxide blasters (ALOX-1 - ALOX-3) and the three (3) steel grit blasters (SGB-1 - SGB-3) comply with 326 IAC 6-3 because the three (3) steel grit blasters and ALOX -1 are controlled by baghouses and the potential emissions from ALOX-2 and ALOX-3 are less than the allowable emissions.

(c) For the four (4) HVLP spray booths (SB-1-SB-4), the five (5) chain on edge machines (COE-1-COE-5), and the ransburg coating process (RCP), compliance is shown by the use of dry filters for particulate matter control.

326 IAC 8-2-9 (Miscellaneous Coating Operation)

The coating and painting facilities are subject to 326 IAC 8-2-9 because the source's Standard Industrial Classification number is 3479 and the VOC potential to emit is greater than fifteen (15) pounds per day.

Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), the volatile organic compound (VOC) content of coatings delivered to the applicators applied to metal curbs shall be limited to 3.5 pounds of VOC per gallon of coating less water for extreme performance coatings.

The coatings shall comply with the 3.5 pounds of VOC per gallon of coating less water limit by the following methods:

(a) SB-1, SB-2, SB-3 and SB-4, are HVLP spray booths that were built after January 1, 1980 and emit greater than 25 tons per year of VOC. These facilities are limited to less than 25 tons of VOC per year per facility, therefore 326 IAC 8-2-9 does not apply.

The input VOC, including clean up solvent, minus the VOC solvent shipped out, delivered to the applicators of each paint booth shall be limited to less than 25 tons per year, rolled on a monthly basis. Therefore, the requirements of 326 IAC 8-2-9 will not apply.

(b) DS-1, is a coating line that was built after January 1, 1980 and emits greater than 25 tons per year of VOCS. DS-1 is limited to less than 25 tons of VOC per year, therefore 326 IAC 8-2-9 does not apply.

The input VOC, including clean up solvent, minus the VOC solvent shipped out, delivered to the applicators of DS-1 shall be limited to less than 25 tons per year, rolled on a monthly basis. Therefore, the requirements of 326 IAC 8-2-9 will not apply.

(c) COE-1 and COE-2 were built after January 1, 1980 and each emits greater than 25 tons per year of VOCS. COE-1 and COE-2 are each limited to less than 25 tons of VOC per year, therefore 326 IAC 8-2-9 does not apply.

The input VOC, including clean up solvent, minus the VOC solvent shipped out, delivered to the applicators of COE-1 and COE-2 shall each be limited to less than 25 tons per year, rolled on a monthly basis. Therefore, the requirements of 326 IAC 8-2-9 will not apply.

(d) DC-2, DC-3, DC-4, DS-2, COE-5, COE-3, COE-4, DC -1, and RCP use coatings that are greater than the 3.5 pounds of VOC per gallon of coating less water limit, the facilities will comply by using a thermal oxidizer (CE-3).

(1) DC-2, DC-3, DC-4, DS-2, and COE-5 were built after July 1, 1990 and have actual VOC emissions greater than 15 pounds per day and therefore, will be controlled by the thermal oxidizer, CE-3, to comply with 326 IAC 8-2-9.

(2) COE-3 and COE-4 were built after January 1, 1980 and each emits greater than 25 tons of VOC per year and therefore, will be controlled by the thermal oxidizer, CE-3, to comply with 326 IAC 8-2-9.

(3) DC-1 was built after January 1, 1980 and emits greater than 25 tons of VOC per year and therefore, will be controlled by the thermal oxidizer, CE-3, to comply with 326 IAC 8-2-9.

(4) RCP was built after January 1, 1980 and emits greater than 25 tons of VOC per year and, therefore, will be controlled by the thermal oxidizer, CE-3, to comply with 326 IAC 8-2-9.

(e) The thermal oxidizer, CE-3, shall operate at all times when DC-2, DC-3, DC-4, DS-2, DS-3, COE-3, COE-4, DC -1, and RCP are in operation. When operating, the thermal oxidizer shall maintain a minimum operating temperature of 1400° F, maintain a minimum destruction efficiency of 98% and a minimum capture efficiency of 94.1%.

326 IAC 8-3-3 and 326 IAC 8-3-6 (Open Top Vapor Degreaser Operation and Control)

The open top degreaser was constructed in 1989, and has an air to solvent interface greater than two (2) square meters (eleven (11) feet), therefore, 326 IAC 8-3-3 and 326 IAC 8-3-6 are applicable.

(a) The Permittee shall ensure that the following control equipment requirements are met:

(1) Equip DG with a cover that can be opened and closed easily without disturbing the vapor zone.

(2) Equip DG with the following switches:

(A) A condenser flow switch and thermostat which shuts off sump heat if condenser coolant stops circulating or becomes too warm.

(B) A spray safety switch which shuts off spray pump if the vapor level drops more than ten (10) centimeters (four (4) inches).

(3) Equip DG with a permanent, conspicuous label which lists the operating requirements outlined in subsection (b).

(4) Equip DG with one (1) of the following control devices:

(A) A freeboard ratio of seventy-five hundredths (0.75) or greater and a powered cover if the degreaser opening is greater than one (1) square meter (ten and eight-tenths (10.8) square feet).

(B) A refrigerated chiller.

(C) An enclosed design in which the cover opens only when the article is actually entering or exiting the degreaser.

(D) A carbon adsorption system with ventilation which, with the cover open, achieves a ventilation rate of greater than or equal to fifteen (15) cubic meters per minute per square meter (fifty (50) cubic feet per minute per square foot) of air to solvent interface area, and an average of less than twenty-five (25) parts per million of solvent is exhausted over one (1) complete adsorption cycle.

(E) Other systems of demonstrated equivalent or better control as those outlined above. Such systems shall be submitted to the U.S. EPA as a SIP revision.

(b) The Permittee shall ensure that the following operating requirements are met:

(1) Keep the cover closed at all times except when processing work loads through the degreaser.

(2) Minimize solvent carryout emissions by:

(A) Racking articles to allow complete drainage;

(B) Moving articles in and out of the degreaser at less than three and three-tenths (3.3) meters per minute (eleven (11) feet per minute).

(3) Prohibit the entrance into the degreaser of porous or absorbent materials such as, but not limited to, cloth, leather, wood, or rope.

(4) Prohibit the occupation of more than one-half (½) of the degreaser's open top area with the workload.

(5) Prohibit the loading of the degreaser to the point where the vapor level would drop more than ten (10) centimeters (four (4) inches) when the workload is removed.

(6) Prohibit solvent spraying above the vapor level.

(7) Repair solvent leaks immediately, or shut down the degreaser if leaks cannot be repaired immediately.

(8) Store waste solvent only in covered containers and prohibit the disposal or transfer of waste solvent in any manner in which greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere.

(9) Prohibit the exhaust ventilation rate from exceeding twenty (20) cubic meters per minute per square meter (sixty-five (65) cubic feet per minute per square foot) of degreaser opening unless a greater ventilation rate is necessary to meet Occupational Safety and Health Administration (OSHA) requirements.

(10) Prohibit the use workplace fans near the degreaser opening.

(11) Prohibit visually detectable water in the solvent exiting the water separator.

Compliance Requirements

Permits issued under 326 IAC 2-7 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAM, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-7-5. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in Section D of the permit are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

The compliance monitoring requirements applicable to this source are as follows:

(a) SB-1, SB-2, SB-3, SB-4, COE-1, COE-2, COE-3 COE-4 and COE-5 have applicable compliance monitoring conditions as specified below:

(1) The dry filters for particulate matter overspray control shall be in operation at all times when the paint booths are in operation.

(2) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray while one or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps shall be considered a violation of this construction permit.

(3) Monthly inspections shall be performed of the coating emissions from the stacks and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for these units shall contain troubleshooting contingency and response steps for when an over spray emission, evidence of overspray emission, or other abnormal emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps shall be considered a violation of this construction permit.

(4) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

(b) DG has applicable compliance monitoring conditions as specified below:

(1) The Permittee shall conduct a visual inspection to determine if the cover is opening and closing properly, completely covers the cleaning machine openings when closed, and is free of cracks, holes, and other defects. These results shall be recorded on a monthly basis.

(2) The Permittee shall determine the hoist speed by measuring the time it takes for the hoist to travel a measured distance. The speed is equal to the distance in meters divided by the time in minutes (meters per minute).

(A) If an exceedance of the hoist speed occurs during quarterly monitoring, the monitoring frequency returns to monthly until another year of compliance without and exceedance is demonstrated.

(B) If the Permittee can demonstrate to IDEM, OAM's satisfaction in the initial compliance report that the hoist cannot exceed a speed of 3.4 meters per minute (11 feet per minute), the required monitoring frequency is quarterly, including during the first year of compliance.

(c) DC-2, DC-3, DC-4, DS-2, DS-3, COE-3, COE-4, DC -1, and RCP have applicable compliance monitoring conditions as specified below:

(1) The thermal oxidizer, CE-3, shall operate at all times when the above-mentioned facilities are in operation. When operating, the thermal oxidizer shall maintain a minimum operating temperature of 1,400° F, maintain a minimum destruction efficiency of 98% and a minimum capture efficiency of 94.1 %.

(2) A performance test shall be required to demonstrate that the source is complying with 326 IAC 8-2-9.

(A) If the oxidizer is determined to demonstrate compliance, the required temperature and control efficiency shall be determined.

(B) If the oxidizer is determined not to demonstrate compliance, the efficiency needed to comply with 326 IAC 8-2-9 shall be determined by the performance test.

(C) The source shall be required to re-submit a new control device with the required control efficiency as determined by the performance test.

(3) The thermal oxidizer, CE-3, shall have an overall efficiency of 92.2%. DC-2, DC-3, DC-4, DS-2, DS-3, COE-3, COE-4, DC -1, and the electrostatic disc coatings with such control (CE-3), shall be in compliance with 326 IAC 8-2-9.

Air Toxic Emissions

Indiana presently requests applicants to provide information on emissions of the 187 hazardous air pollutants (HAPs) set out in the Clean Air Act Amendments of 1990. These pollutants are either carcinogenic or otherwise considered toxic and are commonly used by industries. They are listed as air toxics on the Office of Air Management (OAM) Part 70 Application Form GSD-08.

(a) This source will emit levels of air toxics greater than those that constitute major source applicability according to Section 112 of the Clean Air Act.

(b) This source shall comply with 326 IAC 2-1-3.3 (Maximum Achievable Control Technology) allowable emissions. The MACT shall be use of the thermal oxidizer (CE-3) which has a capture efficiency of 94.1% and a destruction efficiency of 98%, in combination with the application method of dip coating.

Conclusion

This metal coating operation will be subject to the conditions of the attached proposed **Part 70 Permit No. T069-7676-00018.**

Indiana Department of Environmental Management
Office of Air Management

Addendum to the
Technical Support Document for Part 70 Operating Permit

Source Name:	Ken-Koat, Inc.
Source Location:	1605 Riverfork Drive East, Huntington, Indiana 46750
County:	Huntington
SIC Code:	3479
Operation Permit No.:	T069-7676-00018
Permit Reviewer:	Felicity L.Lao

On April 30, 1999, the Office of Air Management (OAM) had a notice published in the Herald Press, Huntington, Indiana, stating that Ken-Koat, Inc. had applied for a Part 70 Operating Permit to operate a metal coating operation. The notice also stated that OAM proposed to issue a permit for this operation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.:

Upon further review, OAM has made the following changes to the final Part 70 permit (changes are bolded for emphasis):

(1) Condition D.1.7 - Recuperative Thermal Oxidizer Operations, has been revised as follows:

D.1.7 Recuperative Thermal Oxidizer Operations

(a) When operating the thermal oxidizer to achieve the limit established under 326 IAC 8-2-9, 3.5 pounds of VOC per gallon of coating less water, the thermal oxidizer shall maintain a minimum operating temperature of 1400° F, or a minimum operating temperature as determined by the most recent compliance test, to maintain a minimum 94.1% capture efficiency and a 98% destruction efficiency of the volatile organic compounds captured. The recuperative thermal oxidizer shall operate at all times, to demonstrate compliance with Conditions D.1.1 and D.1.2, when DC-2, DC-3, DC-4, and DS-2 are in operation.

(b) The owner or operator shall install, calibrate, operate and maintain a device that continuously records the combustion temperature of any effluent gases incinerated to achieve compliance with the limit in Condition D.1.2.

(1) This device shall have an accuracy of ± 2.5EC or ± 0.75 percent of the temperature range measured in degrees Celsius, whichever is greater.

~~(b)~~**(c)** Any change or modification which may increase the VOC actual emissions to 250 tons per year or more shall require prior approval from OAM before such change may occur.

(2) Condition D.1.8 - Record Keeping Requirements, has been revised as follows:

D.1.8 Record Keeping Requirements

(a) To document compliance with Conditions D.1.1 and D.1.2, the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC and HAPs usage limits and the VOC and HAPs emission limits established in Conditions D.1.1 and D.1.2.

(1) The amount of VOC and HAP content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;

(2) A log of the dates of use;

(3) The cleanup solvent usage for each month;

(4) The total VOC usage for each month;

(5) The total HAPs usage for each month; and

(6) Monthly emissions in pounds of VOC and HAPs.

(b) ~~To document compliance with Condition D.1.1(b), records of the minimum operating temperature shall be maintained daily.~~ **Continuous or intermittent readings of the minimum operating temperature shall be maintained to document compliance with Condition D.1.9.**

(c) Record of all malfunctions (any sudden unavoidable failure of the thermal oxidizers, CE01, CE02, and CE03) which result in violations of the Office of Air Management rules shall be kept for a period of three (3) years and made available to OAM upon request. When a malfunction resulting in a limit or parameter deviation occurs that lasts in excess of one (1) hour, notification of the condition shall be made to OAM no later than four (4) daytime business hours after the occurrence.

(d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

(3) Condition D.2.9 - Recuperative Thermal Oxidizer Operations, has been revised as follows:

D.2.9 Recuperative Thermal Oxidizer Operations

(a) When operating the thermal oxidizer to achieve the limit established under 326 IAC 8-2-9, 3.5 pounds of VOC per gallon of coating less water, the thermal oxidizer shall maintain a minimum operating temperature of 1400° F, or a minimum operating temperature as determined by the most recent compliance test, to maintain a minimum 94.1% capture efficiency and a 98% destruction efficiency of the volatile organic compounds captured. The recuperative thermal oxidizer shall operate at all times, to demonstrate compliance with Condition D.2.1, when DC-1, RCP, COE-3 and COE-4 are in operation.

(b) The owner or operator shall install, calibrate, operate and maintain a device that continuously records the combustion temperature of any effluent gases incinerated to achieve compliance with the limit in Condition D.1.2.

(1) This device shall have an accuracy of ± 2.5EC or ± 0.75 percent of the temperature range measured in degrees Celsius, whichever is greater.

~~(b)~~**(c)** Any change or modification which may increase the VOC actual emissions to 250 tons per year or more shall require prior approval from OAM before such change may occur.

(4) Condition D.2.11 - Record Keeping Requirements, has been revised as follows:

D.2.11 Record Keeping Requirements

(a) To document compliance with Condition D.2.1, the Permittee shall maintain records in accordance with (1) through (7) below. Records maintained for (1) through (7) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC and HAPs usage limits and the VOC and HAPs emission limits established in Conditions D.2.1.

(1) The amount of VOC and HAP content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;

(2) A log of the dates of use;

(3) The daily volume weighted VOC content of the coatings as applied;

(4) The cleanup solvent usage for each month;

(5) The total VOC usage for each month;

(6) The total HAPs usage for each month; and

(7) Monthly emissions in pounds of VOC and HAPs.

(b) ~~To document compliance with Condition D.2.1(b), records of the minimum operating temperature shall be maintained daily.~~ **Continuous or intermittent readings of the minimum operating temperature shall be maintained to document compliance with Condition D.1.9.**

(c) Record of all malfunctions (any sudden unavoidable failure of the thermal oxidizers, CE01, CE02, and CE03) which result in violations of the Office of Air Management rules shall be kept for a period of three (3) years and made available to OAM upon request. When a malfunction resulting in a limit or parameter deviation occurs that lasts in excess of one (1) hour, notification of the condition shall be made to OAM no later than four (4) daytime business hours after the occurrence.

(d) To document compliance with Conditions D.2.8 and D.2.10, the Permittee shall maintain a log of weekly overspray observations, daily and monthly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.

~~(d)~~**(e)** All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

Appendix A: Emissions Calculations
VOC and Particulate
From Surface Coating Operations
Chain On Edge #5 (COE-5)

Company Name: **Ken-Koat, Inc.**
Address City IN Zip: **1605 River Fork Drive East, Huntington, IN. 46750**
CP: **069-9246**
Plt ID: **069-00018**
Reviewer: **FLL**
Date: **2/15/99**

Material	Density (Lb/Gal)	Weight % Volatile (H20& Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Vol (solids)	Gal of Mat (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential ton/yr	lb VOC /gal solids	Transfer Efficiency
205A (primer) + MEK	7.29	86.39%	0.0%	86.4%	0.0%	7.41%	0.00006	10000.000	6.30	6.30	3.78	90.69	16.55	0.65	84.99	75%
220 (topcoat) + Toluene	8.29	86.07%	0.0%	86.1%	0.0%	9.08%	0.00023	10000.000	7.14	7.14	16.41	393.86	71.88	2.91	78.58	75%
252H (topcoat) + Toluene	7.77	86.20%	0.0%	86.2%	0.0%	8.38%	0.00023	10000.000	6.70	6.70	15.40	369.72	67.47	2.70	79.93	75%
253H(topcoat) + Toluene	7.79	87.55%	0.0%	87.6%	0.0%	6.57%	0.00023	10000.000	6.82	6.82	15.69	376.47	68.71	2.44	103.81	75%
EP6788-50 + Toluene	7.78	86.61%	0.0%	86.6%	0.0%	7.92%	0.00023	10000.000	6.74	6.74	15.50	371.95	67.88	2.62	85.08	75%

State Potential Emissions	**Add worst case coating to all solvents**	**66.78**	**1602.69**	**292.49**	**11.33**	

METHODOLOGY

Pounds of VOC per Gallon Coating less Water = (Density (lb/gal) * Weight % Organics) / (1-Volume % water)
Pounds of VOC per Gallon Coating = (Density (lb/gal) * Weight % Organics)
Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr)
Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (24 hr/day)
Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (8760 hr/yr) * (1 ton/2000 lbs)
Particulate Potential Tons per Year = (units/hour) * (gal/unit) * (lbs/gal) * (1- Weight % Volatiles) * (1-Transfer efficiency) *(8760 hrs/yr) *(1 ton/2000 lbs)
Pounds VOC per Gallon of Solids = (Density (lbs/gal) * Weight % organics) / (Volume % solids)